

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF IOWA**

In re:

MERCY HOSPITAL, IOWA CITY, IOWA, *et al.*,

Debtors.

)  
) Chapter 11  
)  
) Case No. 23-00623 (TJC)  
)  
) (Jointly Administered)  
)  
) **Objections Due: August 23, 2024 at 4:00 p.m.**  
**Hearing Date: *Only if objections are filed***

**FOURTH & FINAL FEE APPLICATION OF THE CUTLER LAW FIRM, P.C.  
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED  
AND FOR REIMBURSEMENT OF EXPENSES AS COUNSEL TO  
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR  
THE PERIOD FROM AUGUST 21, 2023 THROUGH JUNE 23, 2024**

The Cutler Law Firm, co-counsel to the Official Committee of Unsecured Creditors of Mercy Hospital, Iowa City, Iowa, respectfully submits the within Fourth and Final Application for Allowance and Payment of Attorney Fees and Costs, and respectfully represents as follows:

1. Cutler Law Firm, co-counsel to the Official Committee of Unsecured Creditors (the “Committee”) appointed in the above-captioned bankruptcy case of Mercy Hospital, Iowa City, Iowa, et. al. (the “Debtors”), hereby seeks payment for services rendered and expenses incurred from June 1, 2024 through and including June 23, 2024; and a final order for this, and all prior interim fee applications.
2. Pursuant to the Order Establishing Procedures for this Fourth and Final Compensation and Reimbursement of Expenses of Professionals, the payments sought by this fourth application are, \$4,716.90 + \$21,199.00, for a total of: \$25,915.90. This consists of:
  - a. 80% of fees for services rendered and 100% of expenses for the time period June 1, 2024 through and including June 23, 2024, for an allowance of \$4,536.00<sup>1</sup> for services rendered and \$180.90 for reimbursement of expenses.
  - b. The remaining 20% of the holdback over the prior 3 fee applications, and this fourth application, as follows:

APPLICATION	HOLDBACK
First	\$5,722.00
Second	\$7,677.00
Third	\$6,666.00
Fourth	\$1,134.00
<b>TOTAL</b>	<b>\$21,199.00</b>

<sup>1</sup> The total amount of fees for services rendered during the specified time period was \$5,670.00.

3. Cutler Law Firm requests this Court enter an Order allowing Final Compensation of \$105,965.00 in compensation and \$1,656.11 for reimbursement from the time period August 21, 2023 through and including June 23, 2024, as Chapter 11 administrative expenses of the Debtors' estates and authorizing the Debtors to pay such compensation and expenses pursuant to sections 330, 331, 503(b) and 507(a)(1) of the Bankruptcy Code. The invoices supporting this final request are attached as Exhibit A.
4. All services for which compensation is requested were performed for and on behalf of the Official Committee in connection with its duties under Chapter 11 of the Bankruptcy Code, and not on behalf of any other person or entity.
5. Jurisdiction is proper under 28 U.S.C. § 1334. This is a court proceeding under 28 U.S.C. § 157(b)(2)(A) & (B).
6. All services rendered as associate counsel for the Official Committee for which compensation is sought were actual and necessary for the advancement of the Client's interest. This is a fourth request for services from June 1, 2024 through June 23, 2024; and a final request for compensation covering August 21, 2023 through June 23, 2024.
7. The professional services that Cutler Law Firm, P.C. has provided in this Chapter 11 case include: all requirements required of associate counsel pursuant to local rules, review applicable pleadings and deadlines, correspondence with Official Committee counsel are requirements and strategy surrounding position of the Official Committee, in-person and telephonic attendance at hearings, all such identified services limited in nature to that required to best serve the Official Committee through the pendency of the case.
8. Significant milestones of the case, and the Committee's ultimate support of a consensual plan with the Debtor, encompass:
  - a. On August 15, 2023, the U.S. Trustee formed the Committee [Docket. No. 107].
  - b. On September 14, 2023, the United States Bankruptcy Court for the Northern District of Iowa (the "Court") entered the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Docket No. 224] (the "Compensation Order").
  - c. The Committee retained Cutler Law Firm, P.C. as co-counsel pursuant to this Court's Order Granting Application to Retain and Employ Cutler Law Firm, P.C. as Co-Counsel for the Official Committee of Unsecured Creditors, Effective as of August 21, 2023 [Docket No. 354].
  - d. On May 14, 2024, the Debtors filed the Debtors' First Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Liquidation [Docket No. 1050] (the "Plan").
  - e. On June 7, 2024 the Court entered an Order confirming the Plan [Docket No. 1114].
  - f. On June 24, 2024 the Debtors filed the Notice of (I) Entry of Order Confirming Debtors' First Amended Joint Chapter 11 Plan of Liquidation and (II) Occurrence of Effective Date [Docket No. 1139].

9. The allowance sought by your applicant is for reasonable compensation for reasonable and actual and necessary services rendered as counsel for the Official Committee, the time, nature and extent which are set forth in the detailed statement attached hereto as Exhibit A, and by this reference made a part hereof.
10. There is neither sharing, nor any agreement or other understanding between applicant and any other persons concerning sharing of fees, other than perhaps regular practicing attorneys engaged with Mr. Gainer in the practice of law as partner or associate; and that said compensation is for services actually rendered in this proceeding.
11. On November 9, 2023, Robert C. Gainer filed his First Interim Application for Compensation for attorney fees and reimbursement of expenses in the total amount of \$23,064.79, for the time period August 22, 2023 through October 31, 2023 (Docket No. 492).
12. On March 6, 2024, Robert C. Gainer filed his Second Interim Application for Compensation for attorney fees and reimbursement of expenses in the total amount of \$31,072.34, for the time period November 1, 2023 through March 4, 2024 (Docket No. 811).
13. On May 30, 2024, Robert C. Gainer filed his Third Interim Application for Compensation for attorney fees and reimbursement of expenses in the total amount of \$27,574.08, for the time period March 5, 2024 through May 30, 2024 (Docket No. 1092).
14. The reasonable value of the services performed by Cutler Law Firm, P.C., on behalf of the Official Committee, for the time period June 1, 2024 through June 23, 2024, as set forth in Exhibit A, and pursuant to the Order, is \$4,536.00 for services rendered and \$180.90 for reimbursement of expenses.
15. Pursuant to the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals, the payments sought by these interim applications were 80% of fees for services rendered and 100% of expenses. At this time, Applicant also seeks the award of the 20% holdback, which totals: \$21,199.00.
16. A declaration of Robert Gainer, supporting the application, is enclosed as Exhibit B.

WHEREFORE, Applicant Cutler Law Firm, P.C., respectfully requests that the Court enter an order granting a final allowance to Cutler for the Fourth and Final Period in the sum of \$4,536.00 in fees and actual and necessary expenses in the amount of \$180.90; the award of the 20% holdback, which totals \$21,199.00; for a total of \$25,915.90; that the Debtors be authorized and directed to pay to Cutler the outstanding amount of such sums; and for any other relief this court deems just and equitable.

Respectfully Submitted,

/s/ Robert C. Gainer

Robert C. Gainer IS9998471

CUTLER LAW FIRM, P.C.

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West Des Moines, Iowa 50266

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CO-COUNSEL FOR THE OFFICIAL

COMMITTEE OF UNSECURED CREDITORS

CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2024 the foregoing instrument was filed electronically with the Clerk of Court using the CM/ECF system which sent notification of such filing to all registered users party to this proceeding, including the United States Trustee.

/s/ Stephanie Newton

MERCY Mercy Hospital, Iowa City, Iowa, et al  
000001 Mercy Hospital, Iowa City, Iowa, et al  
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- 10/31/2023  
Time & Rate: Bill Value

### Fees

Date	ID	Description	Time	Bill Amount
8/22/2023	RCG	Phone call with Andrew Sherman and Boris Mankovetskiy surrounding: extensions on deadlines, motion practice, Local Rules, and considerations relative to outstanding discovery in chapter case; Review correspondence from Terry Gibson surrounding communications with United States Trustee (N/C); Review correspondence from Andrew Sherman surrounding requirements relative to admission, and upon review, prepare responsive correspondence with template in conformance with Local Rules on application (.3).	0.50	\$175.00
8/23/2023	RCG	Review correspondence from Andrew Sherman surrounding initial diligence, and outstanding continuance relative to forthcoming motions, and exchanges thereon relative to ECF requirements; Review correspondence from Andrew Sherman surrounding ongoing negotiation with Debtor and secured creditors surrounding continuance, and prepare responsive correspondence with reference to edits and amendments and requirements surrounding Appearance (Local Rules) (.3); Review proposed Pro Hac Vice Motions, amend to conform with Local Rules, and prepare proposed Orders (.5); Review draft Motion for Continuance, and Order, and amend to conform with Local Rules and representation requirements (.4); Review correspondence from Andrew Sherman surrounding general status, bid procedures and examiner Motions and Committee Members, and enclosed IRS filings supporting control of foundation (41 pages); Review court correspondence on filed Notice, and Motions (.2); Prepare correspondence to clerk on proposed Order relative to Pro Hac Vice Admissions (.2); Review correspondence from Wellmark Counsel, Jeff Goetz, on Committee, and prepare responsive correspondence addressing same (.1); Review Motion for Order Authorizing Employment of Professional Used in the Ordinary Course of Business and proposed Order on same (.3); Review Motion for Entry of Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals and proposed Order thereto (.3); Review Application to Employ Nyemaster Goode and Order thereto and Declaration (.3); Review Application to Employ McDermott, Counsel for Debtors, and proposed Order and Declaration (.3); Review Court Orders on Pro Hac Motions, and prepare correspondence to Andrew Sherman addressing same.	3.60	\$1,260.00
8/24/2023	RCG	Review correspondence from Carroll Schuyler, Committee Representative, surrounding questions on Motion to Continue and exchanges with Andrew Sherman addressing same; Review correspondence from Andrew Sherman and exchanges with Carroll Schuyler, Committee Rep, surrounding Motion to Continue, and filing authorization, and format revised Motion pursuant to Local Rule; Review correspondence on Motion to Continue Hearing and prepare correspondence to Andrew Sherman addressing same.	0.70	\$245.00
8/25/2023	VT	Research whether a non-profit can compel a foundation to disburse money.	3.60	\$720.00
8/25/2023	RCG	Review correspondence from Roy Leaf, Debtor Counsel, on proposed Orders; Phone call with Andrew Sherman on: Debtor counsel retention, Mercy Foundation monies available, procedural mechanism to restrict cash collateral usage, and hearing (.3); Prepare preliminary outline on intersection of not-for-profit & Foundation relationships, Iowa Chapter 504 review, and preliminary considerations relative to Board action, and standards of conduct (.4); Review correspondence from Andrew Sherman surrounding hearing and communications with client; Review Debtor's Application for Entry of Order Authorizing Employment of Investment Banker and proposed Order (.2); Review Notice of Hearing surrounding Debtor's Motion to Employ Professionals in the ordinary course and establish interim compensation and applicable deadlines (.1); Review U.S. Trustee Objection to Motion to Approve Bid Procedures, with notation surrounding Stalking Horse protections (.2); Review Motion by Master Trustee-Bondholder Representative relative to continuance (.2); Participate in hearing on Motions to Continue, and extend time of bid procedures; Review correspondence from Andrew Sherman on communications with Debtor's Counsel, Roy Leaf, relative to extensions of time on bidding procedures hearing, and objection down the line and enclosed communication and subsequent communication with Committee.	2.50	\$875.00
8/26/2023	RCG	Review Court Memorandum and Order on Motion to Appoint Examiner and Motion to Continue Hearing on Sale of Property and Bid Procedures, Order Continuing Hearing of Master Trustee & Order Continuing Hearing on Bidding Procedures (162-164); Review filed schedules (Docket 135-314 pages), and notes on same relative to potential recovery and extent of dealings (1.9);	3.80	\$1,330.00

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**Statement of Account**

MERCY Mercy Hospital, Iowa City, Iowa, et al  
000001 Mercy Hospital, Iowa City, Iowa, et al

- 10/31/2023  
Time & Rate: Bill Value

### Fees

Date	ID	Description	Time	Bill Amount
		Review statement of financial affairs (Docket 136-145 pages) and global notes and statement of limitations, with notes addressing transfers and in considerations on derivative standing (.1.3); Review supplement to Schedule A and B, against Schedule A and B relative to real estate (.1).		
8/27/2023	RCG	Review Memorandum addressing 8th Circuit Authority on not-for-profit foundational funds, shepardize same, and against Iowa Code Section 504, prepare final legal opinion (.7); Prepare correspondence to Andrew Sherman on intersection of not-for-profit & foundation, relative to restricted use of funds (.2).	0.90	\$315.00
8/28/2023	RCG	Review correspondence from Andrew Sherman addressing fiduciary duties relative to compel foundation funds; Review correspondence from Andrew Sherman surrounding questions on advanced conflict waivers under Iowa law, and preliminary review of Iowa Code Chapter 32:1.7, 8, 9, 10, 22 (.7); Phone call with Andrew Sherman on considerations relative to advanced conflict waivers given Debtor's counsel filing (.3); Review supplement to Schedule A and B, against Schedule A and B relative to real estate; Participate in client call relative to pending motions, objections and applicable deadlines.	1.80	\$630.00
8/29/2023	RCG	Phone call with Janet Reasoner, U.S. Trustee, surrounding potential conflict, Advanced Payment Retainer, and discussion surrounding intersection of 7th Circuit and 8th Circuit Authority relative to property of the Estate; Review correspondence from Andrew Sherman surrounding extent of potential Debtor counsel conflicts and exchanges with Janet Reasoner, U.S. Trustee, on same; Review docket relative to first day Motion Orders, and Orders on Bid Procedures relative to objection deadline (.4); Prepare correspondence to Roy Leaf, Debtor Counsel, on deadline for objection to bidding procedures (Docket 58) (.1); Review correspondence from Roy Leaf, Debtor Counsel, on bid procedures and enclosed document and responsive correspondence on same (.2); Prepare correspondence to Andrew Sherman on applicable deadlines and delegation of efforts (.2).	1.50	\$525.00
8/31/2023	RCG	Phone call with Andrew Sherman surrounding: bid procedures, cash collateral request of Debtors, considerations on September 13th hearing, and requirements relative to preservation of collateral against foundation asset; Review correspondence from Dan Simon, Counsel for Debtor, on proposed compromise; Review correspondence from Andrew Sherman addressing foundation cash collateral issues, retention issues, sale process and communications with Debtor Counsel and exchanges with Committee members thereon; Review correspondence from Andrew Sherman addressing demands upon Debtor counsel, and September 13, 2023 Hearing.	0.90	\$315.00
<b>Total Fees: 08/2023</b>			<b>19.80</b>	<b>\$6,390.00</b>
9/1/2023	RCG	Review correspondence of Patrick Magallanes, Committee Member, surrounding plan of action and questions; Review correspondence from Peter Chalik, Counsel for Preston Hollow, on proposed witness and exhibit list and enclosed document, relative to pre-trial depositions.	0.40	\$100.00
9/2/2023	RCG	Review correspondence from Roy Leaf, Debtor Counsel, on Debtor's witness and exhibit list and enclosed document; Review correspondence from Patrick Magallanes, Steindler Orthopedic, on requirement surrounding Committee meeting, By-Laws, and enclosed documents.	0.40	\$140.00
9/3/2023	RCG	Review correspondence from Nathan Coco, Debtor Counsel, relative to hearing on Examiner (.1); Review correspondence from Jason Teele, surrounding proposed objection deadlines, and review Court Orders at Dockets 163 & 164, relative to existing deadlines (.3); Prepare correspondence to Andrew Sherman, OCUC, on requirements under local practice, and considerations on leave of court given preset deadlines (.2); Review correspondences from Andrew Sherman, OCUC, addressing local practice and Committee communications.	0.80	\$280.00
9/5/2023	RCG	Review correspondence from Andrew Sherman surrounding extension of time relative to objection deadlines and communications with Debtor counsel on same.	0.20	\$70.00
9/6/2023	RCG	Phone call with Janet Reasoner, U.S. Trustee, surrounding objection to tension applications, agreements with Committee, and concerns given 2018 appraisal; Review supplemental certificates of services filed by EPIC (.1); Review first notice pursuant to Patient Care Ombudsman (.1); Review Court Order continuing hearing on examiner motion and requirements of court relative to deadlines (.2); Phone call with Andrew Sherman on considerations on objection to retention applications, potential for reorganization, banker need, and lever for foundation money release (.4); Review correspondence from Andrew Sherman surrounding negotiations with Debtor relative to success fees, and a supplemental declaration of Debtor counsel (enclosure) against	1.70	\$595.00

## Statement of Account

MERCY Mercy Hospital, Iowa City, Iowa, et al  
 000001 Mercy Hospital, Iowa City, Iowa, et al

- 10/31/2023  
 Time & Rate: Bill Value

## Fees

Date	ID	Description	Time	Bill Amount
		Iowa Rules of Professional Conduct relative to advanced payment retainer and advanced written waivers (.6).		
9/7/2023	RCG	Review correspondence from Andrew Sherman on position relative to retention applications, second communication on Committee contact and proposed objections (.3); Review proposed objections, and revise to address requirements under Local Rule and considerations given communication with U.S. Trustee (.3); Review correspondence from Andrew Sherman on communication with Debtor counsel relative to production of information and agreement on confidential information and phone call with Andrew Sherman addressing same; Review objection to application to employ McDermott Will & Emery filed by U.S. Trustee (.2); Review objection to employment of H2C Securities as the investment banker filed by U.S. Trustee and authority therein (.1); Review U.S. Trustee objection to retention of Nyemaster Goode Law Firm (.2); Review objection to employment of ToneyKorf Partners and notes on same (.2); Review correspondence from Andrew Sherman on proposed objection to ToneyKorf & Debtor retention, review same, and prepare responsive correspondence on position on disinterestedness and materially adverse, and retention application.	1.90	\$665.00
9/8/2023	RCG	Review correspondence from Andrew Sherman on discovery issues, and prepare responsive correspondence on recommendations given local practice; Review correspondence from Kaitlin Walsh, Counsel for Secured Bondholders, surrounding meet & confer, and responsive correspondence of Dan Simon, Debtor Counsel, addressing same and exchanges therein; Prepare proposed status conference request given background information on failing in discovery production (.4); Prepare correspondence to Andrew Sherman on draft status conference request, revisions to objections on cash collateral and retention and enclosed documents (.2); Exchanges with Andrew Sherman surrounding delegation of efforts on production, meet & confer, communication, and filings (.2); Phone call to Brian Fagan, Counsel for Foundation, on outstanding discovery issues, and prepare correspondence addressing same (.2); Review correspondence from Patrick Magallanes, Committee Member, surrounding strategy of Committee.	1.50	\$525.00
9/9/2023	RCG	Review correspondence from Janet Reasoner, U.S. Trustee, addressing Cedar Rapids Gazette article on break up fee, overbid amounts, enclosed article, and responsive correspondence of Andrew Sherman addressing same relative to revised bid procedures and enclosed bid procedures; Review filing by CrossMed Healthcare Staffing Solutions (.1); Review Notice filed on behalf of Debtor by counsel, Nathan Bull (.1); Review objection to sale of property filed by RMS Holdings and attendant authority cited therein, and exhibit thereto (.3); Review supplemental Declaration of Debtor (.1); Review correspondence from Eric Lam, Counsel for Foundation, surrounding resolution of confidentiality issue, and responsive correspondence of Kaitlin Walsh, Counsel for Secured Bondholders, relative to D-designation from confidential and attorneys-eyes-only.	1.10	\$385.00
9/10/2023	RCG	Review: Objection to Application to Employ H2C, Objection to ToneyKorf filed by Bondholders (.2); Review response to bid procedures and Motion to Sell filed by Bondholders and position surrounding real estate valuations (.3); Review Objection of Bondholders to Debtor counsel retention (.1); Review court correspondence on Objections filed to cash collateral and retention.	0.80	\$280.00
9/11/2023	RCG	Review supplemental declaration (Bayman) for H2C Securities retention; Review correspondence from Andrew Sherman, surrounding proposed retention motion and enclosed motion (.3); Working off of motion provided by Andrew Sherman, and against prior documents used, prepare retention application for Cutler Law Firm, and applicable declaration and representations (.8); Prepare correspondence to Andrew Sherman on requirements of Committee approval, and submission (.2); Review Motion to Continue Hearing, and proposed Order; Review correspondence of Janet Reasoner, U.S. Trustee, surrounding bid procedures negotiation and responsive correspondence of Andrew Sherman addressing same.	1.70	\$595.00
9/12/2023	RCG	Phone call with Andrew Sherman surrounding September 13, 2023 Hearings, communications with U.S. Trustee on additional disclosures necessary for ToneyKorf (.2); Review correspondences (2) from Andrew Sherman addressing Foundation retention of ToneyKorf, Foundation decision on non-disbursement to hospital and attendant Mercy Hospital Foundation Finance Committee Meeting Minutes (.3); Review correspondences from Committee surrounding retention application and authorization relative to acceptance (.2); Review Court Docket for May 1, 2023 relative to parties positions, and requirements of Committee, and prepare correspondence to Andrew Sherman addressing Committee positions of record and requirements relative to	3.00	\$1,050.00

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**Statement of Account**

MERCY Mercy Hospital, Iowa City, Iowa, et al  
000001 Mercy Hospital, Iowa City, Iowa, et al

- 10/31/2023  
Time & Rate: Bill Value

**Fees**

Date	ID	Description	Time	Bill Amount
		appearance (.3); Review correspondence from Andrew Sherman surrounding objection to ToneyKorf success fee; Review Order Continuing Hearing on Cash Collateral Motion (.1); Review second supplemental Declaration of Felicia Gerber Perlman, as against first, relative to disinterestedness and materially adverse; Review correspondence from Roy Leaf surrounding proposed Orders and revised Orders relative to first day Motions (.1); Against retention objection summary chart (Docket 210), compare proposed Orders relative to representations to court (.3); Review Debtor's Omnibus reply in support of Debtor's Application for Retention and Retention objections summary chart, against sought relief; Phone call from Narendra Ganti, FTI Consulting, surrounding Local Rule requirements relative to retention of professionals and requirements of performance in the Northern District of Iowa; Review Notice of Revised Proposed Order on Bid Procedure, and black line revisions attached thereto relative to applicable deadlines, milestones, success fee and revised bid procedures (52 pages).		
9/13/2023	RCG	Review patient care ombudsman first interim report; Attend bankruptcy hearings on application retentions, bid procedures, first day motions & ordinary course professional compensation & compensation of professionals and post-hearing meeting with Debtor's counsel, Foundation counsel, Bondholders counsel; Round trip travel time to/from Cedar Rapids Federal Courthouse for bankruptcy hearings on September 13, 2023 [billed at 1/2 time] (4.8); Review correspondence from Roy Leaf, Debtor Counsel, on proposed Orders and enclosed proposed Orders.	7.50	\$2,625.00
9/14/2023	RCG	Review Notice of Appearance filed by Paula Roby on behalf of certain Mercy pensioners (.1); Review Motion for Relief from Stay filed by the Estate of Steven Schwarz (.1); Review supplemental Declaration of Mark Toney relative to retention (.1); Review Proceeding Memo and Order regarding motions, against outstanding chart on motions and applicable continuation dates and deadlines (.2); Review correspondence from Narendra Ganti, FTI Consulting, surrounding proposed Application for Retention, review same and prepare responsive correspondence on specific references to Local Rules for retention of professionals; Review correspondence from Andrew Sherman, OCUC Counsel, on subsequent negotiations with Debtors, Foundation and Preston Hollow and enclosed proposed term sheet (408) (.3); Prepare correspondence to Andrew Sherman on Committee communication, retention applications, and exchanges thereon (.2); Review correspondence from Andrew Sherman, OCUC Counsel, surrounding retention application and exchanges thereon relative to requirements, changes, and declaration; Review correspondence from Andrew Sherman, OCUC Counsel, surrounding retention application and exchanges thereon relative to requirements, changes, and declaration (.2); Review 64 pages of declaration, proposed Order, relative to retention application and requirements of Local Rules, and modifications to same (.7); Review correspondence from Narendra Ganti & Cliff Zucker, FTI Consulting, on retention and requirements relative to declaration and incorporation of changes and exchanges thereon (.3); Review FTI Consulting retention application, and amend to conform with Local Rules and requirements thereon (.2); Prepare correspondence to Patrick Magallanes, Committee Member, on retention application and his response addressing same.	3.10	\$1,085.00
9/15/2023	RCG	Review correspondence from Andrew Sherman, OCUC Counsel, surrounding updated settlement discussions, proposed discussion [redacted] relative to resolution and responsive correspondence of Committee Member, Patrick Magallanes; Review court correspondence on Application to Employ Cutler Law Firm (.1); Review court correspondence on Application to Employ Sills Cummis & Gross Law Firm (.1); Review court correspondence on Application to Employ FTI Consulting as Financial Advisor (.1); Prepare correspondence to client and financial advisors surrounding Retention Applications and next steps relative to court requirements (.2); Review filings by Creditor, MediRevv; Review Court Order Authorizing Retention of Nyemaster Goode Law Firm (.1); Review Court Order Authorizing Retention of McDermott Will & Emery for Debtor (.1); Review Court Order on Hearing regarding Motion for Relief from Stay (.1); Review Court Order regarding Pre-Petition wages (.1); Review Court Order on maintenance of existing insurance policies and payment of insurance related to Pre-Petition payments (.1); Review Court Order surrounding maintenance of refund policy (.1); Review Final Order Approving Debtor's Adequate Assurance Payment (.2); Review Order Authorizing Payment of Pre-Petition Taxes and Fees (.1); Review Order Approving Bid Procedures, against proposed red line, noting applicable deadlines (.4); Review Order Authorizing Employment and Payment of Ordinary Course of Professionals (.2); Review Court Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses (.1); Review correspondence from Roy Leaf, Debtor Counsel, surrounding proposed Orders on Hearing (continuance) and Motion on same and enclosed documents.	2.70	\$945.00



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000001 Mercy Hospital, Iowa City, Iowa, et al

- 10/31/2023  
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**Fees**

Date	ID	Description	Time	Bill Amount
9/16/2023	RCG	Review correspondence from Roy Leaf, Debtor Counsel, on proposed Order on H2C retention, and enclosed Amended Order.	0.20	\$70.00
9/17/2023	RCG	Review correspondence from Andrew Sherman on updated term sheet and departure from original document, and enclosed red line.	0.40	\$140.00
9/19/2023	RCG	Review Court Order authorizing employment of H2C Securities as Investment Banker (.2); Review Proceeding Memo and Order regarding Motion to Continue Hearing (.1); Review Mercy Foundation Notice filing (.1); Review Notice of Telephonic Hearing relative to ToneyKorf retention (.1); Review Debtor Certificate of Service of Publication, and enclosed attestation of public legal notice (.2).	0.70	\$245.00
9/20/2023	RCG	Prepare Notice of Bar Date for employment retentions for counsel & FTI (.4); Prepare correspondence to Andrew Sherman on proposed documents and exchange thereon (.1); Participate in hearing on retention, cash collateral, and examiner (.3); Review correspondence from Boris Mankovetskiy, OCUC Counsel, surrounding ToneyKorf retention, resolution, and enclosed proposed Order (.3); Review correspondence from Committee Members on proposed Order and position on retention (.2); Review correspondence from Roy Leaf, Debtor Counsel, on competing Order and revise paragraph 4 and enclosed Order (.2).	1.50	\$525.00
9/21/2023	RCG	Review court correspondence on Notice Setting Bar Date for Objections; Review Notices of Appearance filed by constituent members (.2); Review Court Order authorizing retention of ToneyKorf (.1); Review Adversary Complaint/Declaratory Action filed by Mercy Foundation, against notes from settlement conference (9/13) (.3); Review Notice of Revised Proposed Order authorizing employment of ToneyKorf Partners and black line (.2); Review Proceeding Memo and Order relative to Application to Employ ToneyKorf Partners (.1).	1.10	\$385.00
9/22/2023	RCG	Review correspondence from Andrew Sherman on communications with Foundation relative to amendment to By-Laws and enclosed demand.	0.30	\$105.00
9/23/2023	RCG	Review Monthly Operating Report filed by Debtor, Mercy Hospital (.1); Review Motions to Appear filed by McKesson (.1); Review Notice of Assumption filed by Debtor and attendant exhibits.	0.40	\$140.00
9/24/2023	RCG	Review correspondence from Andrew Sherman on communications directed to Debtor based on Foundation (Mercy) activity and enclosed communication (.2); Review correspondence to Committee on demand and position of OUCC (.1).	0.30	\$105.00
9/26/2023	RCG	Review correspondence from Andrew Sherman on communications with Mark Toney, CRO, to Mercy Hospital Foundation, and enclosed communication directed to Foundation (.2); Review correspondence from Patrick Magallanes, Committee Member, on question surrounding Committee release (.1); Review Orders Granting Motions to Appear and Notice on same.	0.50	\$175.00
9/27/2023	RCG	Review correspondence from Roy Leaf, Debtor Counsel, surrounding proposed Order granting expedited motion and enclosed document; Review correspondence from Andrew Sherman addressing restricted funds and Mercy Foundation requirements; Review court filings as follows: request for daily transcript (.1); Motion to Enforce Automatic Stay against certain staffing agencies and exhibits thereto (49 pages) (.5); Review Motion to Expedite Hearing and proposed Order (.2).	1.10	\$385.00
9/28/2023	RCG	Review Motions to continue hearing(s): Examiner, MFRFS, and Cash Collateral and attachments (.3); Review Court Order setting expedited hearing to enforce automatic stay (.1); Review Affidavit of Publication (.1); Review Notice of Hearing regarding Motion to Enforce Automatic Stay (.1); Review correspondence from Nicholas Marten surrounding Committee constituency; Review correspondence from Andrew Sherman surrounding negotiations with Debtor, Preston Hollow, and preliminary resolution with Foundation (.1); Review settlement term sheet outlining duties of Foundation, timeframe for review, extensive release by parties, subpoenas, and adversary proceeding (.2).	1.10	\$385.00
9/29/2023	RCG	Review correspondence from Andrew Sherman surrounding progress on term sheet, and enclosed revised term sheet (red line) (.2); Review responsive correspondence of Committee Member relative to term sheet and considerations on marketing and value of assets (.1); Review correspondence of Andrew Sherman addressing asset valuation, joint venture assets, proof of claim deadline, auction, Foundation issues (to close) and enclosed documents (.3); Review correspondence from Andrew Sherman addressing October 3, 2023 hearing, and exchanges thereon; Review correspondence from Roy Leaf, Debtor Counsel, on proposed Orders on Motion to Continue Hearing set for October 3, 2023 and enclosed proposed Orders; Review Docket Entries #282-#287 addressing Motions to Appear Pro Hac Vice and various Appearances (.3);	1.90	\$665.00

## Statement of Account

MERCY Mercy Hospital, Iowa City, Iowa, et al  
 000001 Mercy Hospital, Iowa City, Iowa, et al

- 10/31/2023  
 Time & Rate: Bill Value

## Fees

Date	ID	Description	Time	Bill Amount
		Review Motion to Continue Hearing filed at Docket #289 and #293 and exhibits thereto (.3); Prepare correspondence to Roy Leaf addressing Motions to Continue and Hearing slate for October 3, 2023 (.1); Phone call with Andrew Sherman surrounding position on Foundation Adversary Complaint, October 3, 2023 Hearing, and bigger picture considerations on auction and sale.		
9/30/2023	RCG	Review correspondence from Narendra Ganti, FTI Consulting, on financial position of Mercy Foundation and enclosed Hospital Foundation over viewed deck relative to waterfall calculations.	0.20	\$70.00
<b>Total Fees: 09/2023</b>			<b>36.50</b>	<b>\$12,735.00</b>
10/1/2023	RCG	Review exhibit list of Debtor relative to enforcement of Automatic Stay Motion (.1); Review Motion for Interim and Final Order on Use of Cash Collateral (objection) as filed by McKesson (.1); Review Court Order setting hearing on Motion for Relief from Stay (preliminary) (.1); Review Court Order continuing hearing on Cash Collateral Motion and Examiner Motion (.1).	0.40	\$140.00
10/2/2023	RCG	Review exchanges with Patrick Magallanes, Committee Chair, and Andrew Sherman, surrounding extent of marketing information, efforts, and extent of auction assets; Review correspondence from Andrew Sherman surrounding latest proposal on proposed settlement term sheet, and enclosed term sheet with notes thereon; Review correspondence from Andrew Sherman surrounding Computershare Trust Company as master trustee Qualified Bid, and cursory review of 293 page bid package to include credit bid Asset Purchase Agreement, cursory review of exhibits, schedules-to include excluded assets, and notes thereon relative to red line agreement.	2.30	\$805.00
10/3/2023	RCG	Review transcript filings and deadlines relative to redaction and Notice (Docket events 303-304, 307-309) and deadline requirements of same (.2); Review Hayes Locums Objection to Notice of Assumption and Assignment (.1); Review Objections to Sale filed by: Healogics, Owens & Minor Distribution, Health Carousel, Progressive Rehabilitation Associates, RMS Holdings, Revology Inc., Roche Diagnostics, and CHI, and notes on same relative to charting objections; Review correspondence from Andrew Sherman on competing bids, and enclosed bid comparison demonstrative (.2); Participate in phone call with Committee Members relative to Foundation term sheet, bids, and sales process and procedure on same (.5); Phone call to Andrew Sherman addressing 1102 requirements, and authority to move forward with consultation role (.1); Review correspondence from Roy Leaf, Debtor Counsel, surrounding stipulation pursuant to Local Rule 4001-1 on automatic stay lift and proposed Order (.2); Review correspondence from Boris Mankovetskiy addressing informational needs and requirements relative to evaluation of request, and responsive correspondence of HJ Dane on underlying Petition and enclosed document (.3); Review correspondence from Roy Leaf surrounding proposed Order surrounding Motion for Violation of Stay and enclosed Order (.2).	2.50	\$875.00
10/4/2023	RCG	Review Objection filed by Altera Digital Health to Assumption and Assignment of Executory Contracts (.1); Review Response and Reservation of Rights filed by McKesson (.1); Review Docket Nos. 321, 322, 324, 326, 328 relative to parties in interest (.2); Review correspondence from Boris Mankovetskiy surrounding auction results and next steps; Phone call to Roy Leaf, Counsel for Debtor, on recent Motions, and auction (.2); Review correspondence from Andrew Sherman surrounding bid status and odd-the-record statements (.1).	0.80	\$280.00
10/5/2023	RCG	Review correspondence from H.J. Dane on proposed Order Lifting Stay and responsive correspondence of Boris Mankovetskiy on same; Review correspondence from Dane on requirements relative to hearing and motion, and prepare correspondence to Boris Mankovetskiy and Andrew Sherman addressing proposed Order and practice in Northern District.	0.40	\$140.00
10/6/2023	RCG	Review Notice of Auction Continuance (.1); Review Proceeding Memo and Order regarding Debtors' Motion to Enforce Automatic Stay (.1); Review correspondence from Kristina Stanger, Counsel for Debtor, surrounding court hearing, Ad Hoc Committee status, and considerations on pensioners, and exchanges thereon; Phone call with Paula Roby, Counsel for Ad Hoc Committee, on pensioners, relative to court hearing; Review correspondence from Boris Mankovetskiy surrounding resolution of Motion for Relief from Stay Hearing and responsive correspondence of Roy Leaf, Debtor Counsel, addressing same; Review Notice of Conversion and name change (.1); Review MediRevv Objection to Assumption and Assignment of Executory Contracts and Sale to Stalking Horse (.2); Review Notice of Appearance (revised) of Mercy Pensioners Ad Hoc Committee (.1).	1.10	\$385.00

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Statement of Account

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- 10/31/2023  
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### Fees

Date	ID	Description	Time	Bill Amount
10/7/2023	RCG	Review Proceeding Memo and Order continuing preliminary hearing on Relief from Automatic Stay (.1); Review Proceeding Memo and Order on Motion to Waive Local Counsel requirement (.1); Review Declaration of Ordinary Course of Professional (anti-trust) (.1); Review Motion to Continue October 10, 2023 Hearing against Court Docket for same relative to complete disposition of hearing events and enclosed proposed Order (.2); Review Objection to Tenants' Motion to Enforce Automatic Stay (Travel Nurse Across America) (.1); Review Court Order continuing hearing on October 10, 2023 (.1); Review correspondences from Andrew Sherman addressing auction and sale, recommendation on pensioners, and responsive correspondence on same.	0.90	\$315.00
10/8/2023	RCG	Review October 7, 2023 correspondence of Andrew Sherman addressing final term sheet with Mercy Foundation, and enclosed term sheet and settlement motion.	0.30	\$105.00
10/9/2023	RCG	Review correspondence from Roy Leaf, Debtor Counsel, on stipulation required under Local Rules, and responsive correspondence of Boris Mankovetskiy addressing same; Review correspondence from Andrew Sherman on resumption of auction.	0.20	\$70.00
10/10/2023	RCG	Review correspondence from Andrew Sherman surrounding conclusion of auction, successful bidder designation and terms; Review Notice of proposed stipulation re Schwarz Estate and proposed Order (.1); Review Motion to Approve Compromise relative to Section 540A.106 Ruling, and proposed Order with exhibit (.4); Review correspondence from Andrew Sherman surrounding resumption of auction and university bid, analysis of bid and position of Preston Hollow.	0.90	\$315.00
10/12/2023	RCG	Review Application for Compensation filed by Debtor's counsel, Nyemaster Goode (.2); Review Application for Compensation filed by McDermott Will & Emery (.2); Review Notice Setting Bar Date for Objections to two fee applications (.2).	0.60	\$210.00
10/14/2023	RCG	Review status report filed by Steindler Orthopedic (.1); Review Court Order granting application to retain Cutler Firm (.1); Review Court Order granting Application to Employ Sills Cummis & Gross (.1); Review Court Order authorizing retention of FTI Consulting (.1); Review Stipulated Order granting Motion for Relief from Stay (modification) (.1); Review Notices filed by Debtor modifying relief from stay (.1); Review Motions to Seal filed by Judy Adronowitz & Dawna Miller (.2).	0.80	\$280.00
10/15/2023	RCG	Review Motion to Seal, and Orders on Motion to Seal (#372, #376-#378).	0.40	\$140.00
10/16/2023	RCG	Review Court Order Granting Motion to Seal (.1); Review Joinder filed by Mercy Hospital Foundation to Iowa Code Section 540A.106 Ruling (.1).	0.20	\$70.00
10/17/2023	RCG	Phone call from Chris Tuttle, Counsel for Pensioner, surrounding plan, sale and questions thereon.	0.20	\$70.00
10/18/2023	RCG	Review Notice of Hearing on Final Cash Collateral Order (.1); Review Application for Compensation of Patient Care Ombudsman (.2); Review correspondence from Andrew Sherman on proposed communication to Preston Hollow and draft communication, against Motion to Compromise with Foundation for position of Committee on assessment of highest & best bid; Review correspondence from Andrew Sherman surrounding issues in negotiation between Debtor and Preston Hollow relative to highest and best bid, and responses of Committee addressing same.	0.90	\$315.00
10/19/2023	RCG	Review correspondence from Oleh Matviyishyn surrounding local practice considerations on Ad Hoc Pensioners Committee's Motion, and prepare responsive correspondence addressing same (.2); Review correspondence from Andrew Sherman surrounding negotiations with Preston Hollow & UIHC and position of Committee and responses of Committee Members addressing same (.2); Review Notice of objection deadline to Patient Care Ombudsman fee application (.1); Review Motion to Establish Official Committee of Pensioners, and upon review of document against Code requirements, prepare correspondence to Andrew Sherman addressing same and position on 1102 Notice and outline of same (.3); Review correspondence from Andrew Sherman on 1102 Motion and communications with Ad Hoc Committee (.1); Review correspondence from Patrick Magallanes, Committee Member, on question surrounding final sale hearing and limitations on Foundation commitments, and notes on same relative to Settlement Agreement (.3).	1.20	\$420.00
10/20/2023	RCG	Review correspondence from Judith Tieskoetter, pensioner, on questions surrounding on-going income; Review correspondence from Andrew Sherman on proposed Motion presenting information (11 U.S.C. § 1102) (.1); Review enclosed proposed § 1102 Motion relative to requirements of that code and local practice, and attendant authority cited therein (Baldwin & REFCO, among others) (.9); Review proposed engagement communication of EPIQ relative to	3.20	\$1,120.00

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## Fees

Date	ID	Description	Time	Bill Amount
		considerations on Judge Collins' comments within court (.3); Prepare correspondence to Andrew Sherman on proposed engagement of EPIQ relative to Committee website and position on Notice (.2); Review Court Order surrounding hearing on Ad Hoc Committee for pensioners; Review secured bondholders Motion to Compel compliance with auction results (36 pages) and notes on same (.8); Review correspondence of Committee Member, Patrick Magallanes, surrounding Ad Hoc Committee (.1); Review correspondence from Andrew Sherman addressing Ad Hoc Committee Motion recommendations, Committee communications (.1); Participate in phone conference with Andrew Sherman and Boris Mankovetskiy addressing: sale process, highest and best bids, Ad Hoc Committee status, and considerations on resolution (.5).		
10/21/2023	RCG	Review Preston Hollow Motion to Compel compliance with auction results and exhibits for notes in advance of Committee communications (.3); Review Motion to Shorten Order for Objection to Motion to Compel (.1); Review application for compensation of H2C and Order Setting Hearing thereon and bar date notice (.1); Review staffing report of Toney Korf Partners and attendant exhibits (.2); Review statement of concerned pension beneficiaries and notes thereon (.2); Review Mercy Hospital Monthly Operating Report with notes on cash position and operational budget (.2).	1.10	\$385.00
10/22/2023	RCG	Review correspondence from Andrew Sherman, addressing Committee Constituents concerns and potential middle ground; Review exchanges of Constituents surrounding position on Ad Hoc Committee.	0.30	\$105.00
10/23/2023	RCG	Review draft 11 U.S.C. § 1102 Motion, and amend to conform with Local Rules and requirements on production of order (.7); Prepare draft notice (bar date) on objection (.2); Prepare correspondence to Andrew Sherman on Reservation Witness & Exhibit List (.1); Review correspondence of Andrew Sherman surrounding position on Reservation risks, and responsive correspondence on bar dates; Review correspondence from Kristina Stanger, Debtor Counsel, on Debtor's Witness & Exhibit List, enclosed documents and exhibits, against Court Docket for November 6 relative to adequacy production (.7); Prepare Witness & Exhibit List for November 6th hearing (.2).	2.10	\$735.00
10/24/2023	RCG	Participate in Committee conference relative to auction, Ad Hoc Committee, and strategy moving forward; Review correspondence on Motion re: 1102.	0.60	\$210.00
10/25/2023	RCG	Review correspondence from Oleh Matviyishyn surrounding Amended Objection to Ad Hoc Committee, and review Amended Objection, against communications with Paula Roby, Counsel for Mercy Pensioners, and notes on same and edits thereto; Review correspondence from Andrew Sherman on proposed response to Ad Hoc Pension Committee and enclosed response (.2); Shepardization of Case Authority, review Case Authority for 8th Circuit-on point & dicta- on third party committee, notes on same (.6); Prepare correspondence to Andrew Sherman addressing proposed response with considerations on additional authority (.2); Review correspondence from Felicia Perlman, Debtor Counsel, on position surrounding Ad Hoc Committee, and responsive correspondence addressing same; Review correspondence from Andrew Sherman on enclosed communications with Debtor counsel surrounding hearings before Judge Collins and enclosed communications (.2); Phone call with Paula Roby, Counsel for Pensioners, on questions surrounding ex-officio position to address concerns of Pensioners, discussion on distinct concerns, discussion on auction and potential sale, and professional fees (.3); Prepare correspondence to Andrew Sherman addressing communications with Paula Roby and position of Committee (.2).	2.30	\$805.00
10/26/2023	RCG	Review Steindler Orthopedic response in support of Pensioners' Motion (.1); Review Notice of Appearance filed by United Health Group (.1); Review response in support of Motion to Compel compliance with auction results filed by Steindler Orthopedic (.1); Review declaration supporting ordinary course of retention (.2); Review adequate assurance objection filed by EverBank (.2); Review correspondence from Andrew Sherman surrounding update on sales process, issues with Preston Hollow, Debtor's position on bid concerns, and reopening of bidding (.1); Review proposed objection to Preston Hollow's Motion to Compel, and authority cited therein relative to position of Committee (.6); Review correspondence of Committee member relative to position on acceptance of PH bid and responsive correspondence of Andrew Sherman addressing same.	1.60	\$560.00
10/27/2023	RCG	Review correspondence from Andrew Sherman surrounding resumption of auction and consideration on respected bids.	0.10	\$35.00

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**Fees**

Date	ID	Description	Time	Bill Amount
10/28/2023	RCG	Review Docket 419 Reply of Pension Beneficiaries, and cursory review of attendant case law appended as exhibit thereto (.8); Review Notice of Amended Notice of Auction Results, and Exhibit A (transcript) (.3); Review Notice of Appearance of Creditor, Allied Resources Medical Staffing (.1); Review Order on Motion by Master Trustee continuing hearing (.1); Review Notice of Hearing on Debtor's Motion for Sale of Assets (.1); Review second Notice pursuant to Patient Care Ombudsman (.1).	1.50	\$525.00
10/31/2023	RCG	Review Notice of Hearing on Debtor's Motion for Sale of Assets (.1); Review Consented Motion to Extend Time to Object to Fee Application (.1).	0.20	\$70.00
<b>Total Fees: 10/2023</b>			<b>27.10</b>	<b>\$9,485.00</b>
<b>Total Fees:</b>			<b>83.40</b>	<b>\$28,610.00</b>

**Costs and Expenses**

Date	Description	Orig Expense	Orig Cost	Bill Amount
09/14/2023	Postage (Applications to VST)	\$6.84		\$6.84
09/20/2023	Mileage to and from Cedar Rapids for Hearing		\$157.95	\$157.95
09/29/2023	Miscellaneous Expense- Parking Expense for Hearing		\$12.00	\$12.00
<b>Total Costs/Expenses: 09/2023</b>		<b>\$6.84</b>	<b>\$169.95</b>	<b>\$176.79</b>
<b>Total Costs/Expenses:</b>		<b>\$6.84</b>	<b>\$169.95</b>	<b>\$176.79</b>

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11/01/2023 - 03/04/2024  
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**Fees**

Date	ID	Description	Time	Bill Amount
11/1/2023	RCG	Review Court Order granting Motion to Extend Deadline for Objections (.1); Review Proceeding Memo and Order surrounding Motion to Establish Official Committee of Pensioners (.1); Review correspondence from Andrew Sherman on on-going negotiation with Preston Hollow (.1); Review proposed Final Cash Collateral Order (25 pages) not an issue relative to 506(c) waiver, definition of trustee adequate protection collateral, and notes on same (.4); Prepare correspondence to Andrew Sherman on extent of lien issued to Preston Hollow [paragraph 4(c)] (.1).	0.80	\$280.00
11/2/2023	RCG	Review Notice to Chapter 12 Trustee remaining for 2023, against plan requirements (.2); Review correspondence from Steve on question surrounding payoffs (.1); Phone call from Andrew Sherman on considerations relative to objections, master trustee reservation of rights and requirements for production (.1); Prepare correspondence to Andrew Sherman on proposed first amended witness and exhibit list, incorporating referenced Debtor's documents & witnesses and enclosed witness and exhibit list (.3); Review correspondence from Andrew Sherman on proposed objection to final cash collateral order relative to specific arguments on 506(c) surcharge, extension of Petition date security interest beyond established production, and notes on same relative to case loss cited (8th Circuit) (.8); Review correspondence from Andrew Sherman on proposed witness and exhibit list, and amendments thereto for finalization.	1.70	\$595.00
11/3/2023	RCG	Review correspondence from Roy Leaf, Counsel for Debtor, on proposed Orders and reservation of rights (.1); Review Mercy proposed Sale Order (45 pages), notes on failure to address OUCC preliminary objections and concerns on enhancement of master trustee position (.9); Review proposed Final Cash Collateral Order, against prior draft as submitted for Committee review (low budget affixed) (.6); Participate in Committee conference surrounding sale motion, potential objection, and strategy considerations (.5); Phone call with Andrew Sherman on delegation of efforts, proposed filing, and considerations on pensioners (.1); Prepare correspondence to Paula Roby, Counsel for Mercy Pensioners, on proposed objection, and consideration of pensioner position (.2); Review correspondence from Narendra Ganti on proposed cash collateral budget and enclosed budget against proposed Order; Review correspondence from Michael Savetsky, surrounding objection to proposed Final Cash Collateral Order and Exhibits A and B (.5); Review correspondence from Michael Savetsky surrounding Declaration of Narendra Ganti & Declaration (.2); Finalize document in conformance with Local Rules on Committee objection and Declaration thereto (.3).	3.60	\$1,260.00
11/4/2023	RCG	Review reservation of rights by secured bondholder representatives (.2); Cursory review of exhibits A through F relative to securitization, obligation, and entitlement to position asserted by bondholders (1.1); Review master trustee reservation of rights (.1); Review exhibit list proposed by master trustee (.1); Review Notice of revised list of ordinary course of professionals and enclosed document identifying same (.2); Review Debtor's statement and notice of reservation of rights (.1); Review McKesson Corporation supplemental response to Sale Motion (.1); Review exhibit list filed by McKesson Corporation, and exhibits thereto filed on the Docket (.9); Review court correspondence on Committee objection to sale (.1); Review court Orders granting Pro Hac Appearances (.2); Review objection to Debtor's list of contracts available for assumption filed by Steindler (.2); Review objection of Kronos to Debtor's Notice of Assumption and Assignment (.1); Review Order establishing Official Committee of Pensioners (.1); Review additional Notices filed on behalf of Kronos & Iowa City Ambulatory Surgical Center (.1).	3.60	\$1,260.00
11/5/2023	RCG	Review Response filed by Iowa/Johnson County Surgeon Investors relative to reservation of rights and requirement on revised executory contract notice (.2); Review status report filed by Debtor surrounding Motion to Enforce Automatic Stay (.1); Review report and exhibits on avoidance actions (.2); Review Declaration of Mark Toney in support of Debtor's proposed sale and cursory review of enclosed transcripts (.5); Review amended exhibit list of Preston Hollow (.1); Review Motion in Limine surrounding testimony of Narendra Ganti (.2); Review response to OUCC Objection filed by bondholders and exhibit thereto (.4); Review U.S. Trustee Notice of Appointment of Pensioners Committee; Review correspondence of Andrew Sherman surrounding negotiations with Debtor and Preston Hollow.	1.90	\$665.00
11/6/2023	RCG	Roundtrip travel to/from Cedar Rapids for Hearing on: Sale Order, Cash Collateral, and Settlement	4.90	\$1,715.00

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## Fees

Date	ID	Description	Time	Bill Amount
		with Foundation (4.8); Pre-hearing communications with Andrew Sherman, Attend Hearing on: Sale Order, Cash Collateral, and Settlement with Foundation, and post-Hearing conference with Preston Hollow counsel on negotiations (2.5).		
11/7/2023	RCG	Review correspondence from Roy Leaf on proposed Orders: Order re 9019 settlement (compiled) (.2); Review Proposed Sale Order (compiled) against docket #441 (.7); Review Proposed Order re: Cash Collateral (2nd Interim) (.3); Review correspondence from Andrew Sherman on evaluation of remaining assets and path to plan, and enclosed documents.	1.40	\$490.00
11/8/2023	RCG	Review court received exhibit list (.1); Review court Notice canceling hearing and Proceeding Memo on 11/6/23 Hearing (.2); Review Court Orders granting Motions on: Motion to Extend Deadline on Fee Objection, Order Approving Sale, and Order Approving Settlement (.2); Review Court Order granting OUCC request for Order establishing information sharing procedures (.1); Review Interim Order authorizing use of cash collateral (.2); Review U.S. Trustee objection to Application for Fees (.2); Prepare correspondence to Co-counsel surrounding references within objection, and position on Local Practice given considerations on complexity and blended rate (.2); Review correspondence from Narendra Ganti on fee applications.	1.30	\$455.00
11/9/2023	RCG	Review correspondence from Greg Kopacz on Sills Cummis' fee applications and statement on necessary edits (.1); Review proposed requests, and enclosed invoices, against Court Order establishing reimbursement of expenses of professionals (Docket 224), and for conformance with Local Practice and In Re: Pothoven, and amend to conform with same and prior U.S. Trustee's Objection to Debtor counsel fee application (.7); Review Application to Employ filed by Pensioners Committee (.1); Review Declarations filed by Deloitte Tax relative to disinterestedness (.1); Review correspondence from Narendra Ganti on proposed fee application, and on communication from Andrew Sherman, revise in conformance with Local Rules; Review court correspondence on filed fee applications for: Sills Cummis, FTI, and Cutler (.2); Prepare correspondence surrounding filed Application, and applicable objection deadline given court closure (.1); Review correspondence from Committee surrounding fee applications.	1.70	\$595.00
11/10/2023	RCG	Phone call from Eashaan Vajpeyi, Medical Malpractice Counsel, on question surrounding claims, reorganization and applicable deadlines.	0.20	\$70.00
11/11/2023	RCG	Review second Application for Compensation of Nyemaster Goode and bar date on same (.2); Review second Application for Compensation by McDermott Will & Emery, Withdrawal, revised filing & bar date, and notes on deadline, stint of request and thoughts on application (.3).	0.50	\$175.00
11/14/2023	RCG	Review Ombudsman report (.1); Review Order of Approving Ombudsman Payment Application (.1); Review Court Order granting application to employ counsel to the Official Committee of Pensioners (.1); Phone call from Paula Roby, Counsel for Official Committee of Pensioners, relative to case background, considerations on constituencies, and requirements moving forward given sale.	1.00	\$350.00
11/16/2023	RCG	Review Application for Compensation of H2C Securities, noting consistency on request against retention, and bar date on same; Review Court Order setting Hearing on Application for Compensation (.1); Review compensation report of ToneyKorf Partners and attendant exhibits relative to requests (.2).	0.50	\$175.00
11/22/2023	RCG	Review Declaration of Ordinary Course of Professional (DDO USA) (.1); Review monthly operating report filed by Mercy (month ending October 31) against September report relative to cash positions and disbursements (.2).	0.30	\$105.00
11/23/2023	RCG	Review Debtor's Motion to Continue matter set for November 28, 2023 (.1); Review correspondence from Roy Leaf, Debtor Counsel, on proposed Order and enclosed Order (.1).	0.20	\$70.00
11/24/2023	RCG	Review correspondence from Andrew Sherman addressing: challenge investigations to bondholder's asserted liens and affirmative claims against Preston Hollow, proposed plan considerations, analysis of Foundation funds, and marketing of remaining assets, and prepare responsive correspondence to Andrew Sherman addressing: Pensioner outreach, plan term sheet and 8th Circuit-local practice considerations (.3); Review Mercy Iowa analysis summary prepared relative to Foundation financial analysis funding (Getzler report) (.4); Review Mercy plan term sheet (privileged and confidential) relative to implementation, covenants & post-confirmation considerations, against 8th Circuit requirements and local practice on third party releases & indemnification provisions, and notes on same (.6); Review U.S. Trustee comment surrounding Motion to Extend Time to Object (.1); Review Court Order granting Debtor's Motion to Continue (.1).	1.50	\$525.00

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## Fees

Date	ID	Description	Time	Bill Amount
11/25/2023	RCG	Review correspondence from Andrew Sherman addressing term sheet and indemnification language.	0.10	\$35.00
11/28/2023	RCG	Review U.S. Trustee's Objection to Fee Application of McDermott Will & Emery (17 pages) (.2); Review Third Application for Compensation of Nyemaster Goode Law Firm, and Notice of Bar Date for Objections noting deadlines (.2); Review Third Application for Compensation of McDermott Will & Emery and Notice of Bar Date for Objections and applicable deadlines (.2); Review correspondence from Jacob Park, FTI Consulting, surrounding proposed fee application (.1); Review proposed application against Local Practice requirements and supporting exhibits (.3); Prepare correspondence to Jacob Park addressing considerations relative to Pothoven (.2); Review correspondence from Adam Saltzman, FTI Consulting, on proposed Committee update and enclosed confidential collateral analysis & fee study, and notes on same; Participate in Committee conference call addressing negotiations with Debtor, considerations on recovery (preliminary), and strategy on same.	2.60	\$910.00
11/29/2023	RCG	Review correspondence from Andrew Sherman addressing comments to term sheet, yesterday's meeting (.1); Review redline plan term sheet provided by Debtors & Bondholders, noting certain issues (.3); Prepare correspondence to Andrew Sherman addressing revised redline plan term sheet, consideration on Committee conference comments (yesterday), and questions (.2); Review correspondence from Jake Park, FTI Consulting, on question surrounding interim retainment of professionals fee application, review Docket 144 & Order on same, and prepare responsive correspondence and exchanges thereon; Review Motion to Extend Time to Assume or Reject Unexpired Leases and proposed Order; Upon review of call notes with Committee, phone conference with Andrew Sherman & Boris Mankovetskiy, related to potential causes of action (Iowa Law based) against Preston Hollow and considerations relative to mediation.	1.40	\$490.00
11/30/2023	RCG	Review correspondence from Andrew Sherman surrounding professional compensation, and prepare correspondence to Dan Simon & Roy Leaf, Debtor Counsel, surrounding requirements relative to Court Order on interim compensation procedure; Review Application for Compensation of Patient Care Ombudsman, and Order setting bar date on same (.2); Review Notice of Hearing on Final Cash Collateral Order (.1); Review Order extending time on ability to assume or reject contracts (.1).	0.60	\$210.00
<b>Total Fees: 11/2023</b>			<b>29.80</b>	<b>\$10,430.00</b>
12/1/2023	RCG	Communications with Paula Roby, Counsel for Pensioners, surrounding the Pensioners interest, Committee, and case considerations.	0.40	\$140.00
12/2/2023	RCG	Review Notice surrounding first meeting of creditors (.1); Review Notice of Hearing on Final Cash Collateral Order, Cash Management Order and Reconsideration Motion (.1).	0.20	\$70.00
12/5/2023	RCG	Review Debtors' exhibit and witness list (.1); Review Bondholders' witness and exhibit list (.2); Review Motion to Extend Exclusivity Period provided by Debtor, and attendant Case Authority cited therein with notes surrounding requested extension and proposed Order (.6); Review correspondence from Roy Leaf, Debtor Counsel, surrounding hearing considerations, and exchanges with Andrew Sherman on same; Prepare correspondence to Andrew Sherman on Committee witness and exhibit list, and exchanges thereon surrounding Local Rules and necessary witnesses (.3); Prepare witness and exhibit list for Committee with applicable reservations (.4); Review court correspondence on witness and exhibit list (.1); Prepare correspondence to Andrew Sherman on witness and exhibit list, requirements of Committee relative to production of evidence, and considerations relative to Local Rule (.2).	2.20	\$770.00
12/6/2023	RCG	Review correspondence from Peter Chalik surrounding Bondholders witness and exhibit list (.1); Review Bondholders witness and exhibit list and cursory review of exhibits A-T, with notes on Committee follow up & preliminary objections (1.1); Prepare correspondence to Andrew Sherman surrounding applicable deadlines under Local Rules, and exhibits offered by Bondholders (.2); Review correspondence from Roy Leaf, Debtor Counsel, surrounding proposed Order, amendments to Exclusivity Period Order, and enclosed proposed Orders (2).	1.60	\$560.00
12/7/2023	RCG	Review Agreed Motion of Debtors and Humana surrounding late filed proofs of claim; Phone call with Andrew Sherman, surrounding: term sheet, negotiations with Debtor, communications with Pensioners, and complaint (draft) relative to information production and position surrounding Iowa requirements on COA's (.3); Review correspondence from Andrew Sherman surrounding claims	1.30	\$455.00



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Date	ID	Description	Time	Bill Amount
		overview, strategy, and evaluation of terms (.1); Review redline term sheet (.1); Review Complaint for Declaratory Relief, and notes on Iowa specific considerations (.6).		
12/8/2023	RCG	Review correspondence from Narendra Ganti, FTI Consulting, surrounding FTI updated collateral analysis, and notes on same (.3); Participate in Committee call surrounding negotiation, outstanding assets, proposed complaint, and strategy (.9); Prepare correspondence to clerk surrounding outstanding Order on Committee Motion for procedure establishing information dissemination; Review Objection by Bondholders to Motion for Extension of Exclusivity, and notes on arguments surrounding analysis relative to Local Practice.	1.70	\$595.00
12/9/2023	RCG	Review correspondence from Andrew Sherman on proposed revisions to term sheet, and enclosed document (.3); Review correspondence with Committee relative to communications to bondholders & Debtor's counsel, and next steps and applicable deadlines (Challenge) (.1).	0.40	\$140.00
12/10/2023	RCG	Review Notice of Hearing on Objection of Contract Counter-parties to Sale Order and Exclusivity Motion (.1); Review Declaration regarding ordinary course of professional (.1).	0.20	\$70.00
12/11/2023	RCG	Review correspondence from Andrew Sherman surrounding settlement negotiations and applicable extension, and exchanges with Committee on same.	0.20	\$70.00
12/12/2023	RCG	Review correspondence of Kaitlin Walsh, Counsel for Bondholders, relative to production of documents in conformance with informal discovery requests, and exchanges thereon with Andrew Sherman surrounding extension of deadlines relative to Challenge, and final cash collateral hearing (.2); Review correspondence from Dan Simon, Counsel for Debtor, on procedure and agreement (.1); Review Objection to Debtor's Third Monthly Fee Application.	0.50	\$175.00
12/13/2023	RCG	Review correspondence from Roy Leaf, Debtor Counsel, addressing cash collateral extensions stipulation and agreement and enclosed document and applicable deadlines; Review correspondence from Andrew Sherman on proposed redline changes to stipulation and agreement on cash collateral and edit (.1); Review exchanges with Debtor Counsel, Roy Leaf, Bondholder Counsel, Kaitlin Walsh, and bondholder-edited document; Review correspondence from Andrew Sherman on stipulation with parties, procedure and enclosed document, with considerations on delegation of efforts.	0.60	\$210.00
12/14/2023	RCG	Review correspondence from Roy Leaf, Debtor Counsel, on requirements relative to motion, and exchanges with Andrew Sherman on same.	0.20	\$70.00
12/15/2023	RCG	Review correspondence from Greg Kopacz surrounding fee application of Sills Cummis, and review proposed Application, revise to conform with Local Rules and In re Pothoven (.4); Review correspondence from Neehandra Ganti, FTI Consulting, on fee application of FTI, and review proposed Application, revise to conform with Local Rules and In re Pothoven (.3); Prepare Notice of Bar Date with applicable deadlines for FTI (.2).	0.90	\$315.00
12/17/2023	RCG	Review correspondence from Roy Leaf, Debtor Counsel, surrounding proposed Order between Debtors Everbank, and the University resolving Everbank's Motion for Reconsideration (.1); Review proposed Order granting hearing adjournment, and proposed Stipulated Order resolving Everbank's reconsideration motion and enclosed Notice & Amended Schedule 3.8(b) (21 pages) (.4); Review correspondence from Megan Preusker surrounding consent of bondholders and enclosed document.	0.60	\$210.00
12/19/2023	RCG	Review court correspondence on Third Application for Compensation of Creditor Committee Counsel, Creditor Committee Financial Advisor, and bar dates on same (.3); Review Fourth Application for Compensation of Nyemaster Goode, and Notice setting bar date for objections thereto (.2); Review Fourth Application for Compensation of McDermott Will & Emery, and Notice of bar date setting objections thereto (.2); Review Notice of First Quarterly Statement of ordinary course of payments (.1); Review Debtor's Expedited Motion to Adjourn Hearing and proposed Order on same (.2); Prepare correspondence to Andrew Sherman addressing filings and requirements of counsel relative to adjourned hearing and compensation (.1).	1.10	\$385.00
12/20/2023	RCG	Review Order granting Second Monthly Application for Compensation of Patient Care Ombudsman (.1); Review Notice Setting Bar Date for fee application of H2C Securities (.1); Review Court Order surrounding contract objections to sale & Cash Collateral Motion & Exclusivity Motion and applicable deadlines (.1).	0.30	\$105.00
12/22/2023	RCG	Review correspondence from Roy Leaf, Debtor Counsel, addressing Mercy rate increase; Review correspondence of Megan Preusker, Counsel for Preston Hollow, surrounding proposed plan term	2.50	\$875.00

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## Fees

Date	ID	Description	Time	Bill Amount
		sheet and redline and notes on same, and responsive correspondence of Andrew Sherman addressing proposed agreements (.3); Review correspondence of Andrew Sherman on Committee communication and enclosed documents (.1); Participate in conference with counsel for Bondholders, and counsel for Debtor, surrounding considerations on plan, negotiations, and term sheet (1.9); Phone call with Andrew Sherman on communications, next steps and requirements of Committee (.1).		
12/24/2023	RCG	Review Monthly Operating Report, and attendant schedules, relative to operating revenues and considerations against waterfall.	0.30	\$105.00
12/26/2023	RCG	Review correspondence from Patrick Magallanes, Committee Chair, on considerations relative to lead-in to bankruptcy, and enclosed documents.	0.20	\$70.00
12/30/2023	RCG	Review correspondence from Roy Leaf, Debtor's Counsel, on Motion for Authority to Settle Employee Bonuses and enclosed Motion, exhibit, and proposed Order (.3); Review responsive correspondence of Nathan Coco, Bondholder Counsel, addressing same (.1); Review statement of Chapter 11 Monthly Operating Report filed by claims agent (.1); Review amended schedules filed by Debtor, and attendant statement of limitations and disclosures (Schedules A/B, E/F, G) (37 pages) against originals relative to Additions, and notes on same; Review U.S. Trustee Objection to Application for Compensation of McDermott Will & Emery (.1); Review Notice of Appearance filed by Stryker Corporation as Creditor (.1); Review Notice of Assumption of Assignment of Executory Contracts Bar Date and applicable deadlines (.1); Review Notice of Compensation Report of ToneyKorf Partners (.2); Review Third Notice of Patient Care Ombudsman Report (.1).	1.80	\$630.00
12/31/2023	RCG	Review Debtor's Application for Entry of Order Expanding the Scope of Employment of H2C Securities and proposed Order on same & supplemental declaration with enclosed engagement letter, and notes on same relative to Committee advisement (.5); Review Motion to Approve Compromise regarding repayment of sign-on bonuses, against original documents, proposal, and Settlement Agreement (.3); Review Court Order on Notice of Bar Date and Hearing on Debtor's Amended Application and applicable deadlines (.1).	0.90	\$315.00
<b>Total Fees: 12/2023</b>			<b>18.10</b>	<b>\$6,335.00</b>
1/2/2024	RCG	Review U.S. Trustee Objection to FTI Consulting Fee Application (second) (.2); Prepare correspondence to FTI on objection, and considerations relative to trustee objections and relief sought given local practice and procedure (.2); Review correspondences (2) of Andrew Sherman surrounding H2C application, expanded scope, and negotiation as between Altera given requirements on demand for assumption and administrative client.	0.60	\$210.00
1/3/2024	RCG	Review Withdrawal of Claim filed by Wendy Reed, relative to creditor waterfall; Review correspondence from Narendra Ganti, FTI Consulting, surrounding U.S. Trustee Objection and considerations on payment, and exchanges with Dan Simon & Roy Leaf, Debtor Counsel, on same.	0.40	\$140.00
1/4/2024	RCG	Phone call with Roy Leaf, Debtor Counsel, addressing Debtor's position on case, position surrounding objections, and next steps.	0.20	\$70.00
1/8/2024	RCG	Phone call with Andrew Sherman surrounding negotiation with Preston Hollow, strategy relative to ongoing negotiation of waterfall, considerations on witnesses and exhibits for January 22nd Hearing (.2); Prepare witness and exhibit list given considerations on evidentiary presentation and necessary rebuttal (.3).	0.50	\$175.00
1/8/2024	SMN	Prepare preliminary Witness & Exhibit List for hearing on 1/22/2024.	0.20	\$20.00
1/9/2024	RCG	Review Witness and Exhibit List filed by Debtors, against prior list relative to notes on hearing preparation (.3); Review court correspondence on Committee's Witness & Exhibit List (.1).	0.40	\$140.00
1/11/2024	RCG	Review Exhibit List filed by Bondholders, against prior exhibit list relative to changes and notes on same; Review correspondence from Andrew Sherman surrounding stipulation reached with Bondholders, and considerations relative to January 22nd Hearing on cash collateral, against matter set for hearing; Review correspondence from Megan Preusker surrounding confirmation on extension of challenge deadline, cash collateral hearing, expiring cash collateral budget, and review responsive correspondence of Nathan Coco addressing informal agreement and responsive correspondence of Roy Leaf, Debtor Counsel, addressing same (.2); Review enclosed cash collateral extension of amended stipulation & redline (.2); Phone call with Andrew	1.10	\$385.00

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### Fees

Date	ID	Description	Time	Bill Amount
		Sherman on status of January 22nd hearing, negotiations with bondholders, negotiations with Altera, considerations on waterfall, and professional fees.		
1/12/2024	RCG	Review correspondence from Andrew Sherman addressing negotiations with Preston Hollow, challenge deadline, and proposed extension and amended stipulation agreement, noting applicable deadlines as against current court setting; Phone call with Andrew Sherman on proposed fee application and considerations on local practice; Review correspondence from Megan Preusker on proposed stipulation and responsive correspondence of client addressing coordination of extension on stipulation & court hearing deadlines.	0.60	\$210.00
1/13/2024	RCG	Review correspondence from Andrew Sherman addressing proposed revisions to Mercy cash collateral extension & enclosed documents; Review correspondences from client surrounding payment, resistance, and prepare responsive correspondence addressing same (.2); Prepare resistance to trustee's Motion to Dismiss, given information provided by client, and preparation of Motion to Continue Hearing (.6); Review correspondence from Roy Leaf, Debtor Counsel, addressing motion to compel, motion to shorten notice, and setting hearing on motion practice against Altera, and enclosed documents; Review Statement of Disinterestedness filed by Judith Dockendorf, Deloitte & Touche, and ordinary course description (.3); Review Notice of Revised Cure Costs with Respect to Potential Limited Assumed Contracts and attached documents (.2); Review Motion for Entry of Order Directing Distribution of Proceeds from sale of Debtor's assets to Bondholders (Exhibits) (.3); Review proposed Order on same relative to requested relief (.1).	1.50	\$525.00
1/15/2024	RCG	Review correspondence from Andrew Sherman on outstanding stipulation, and exchanges with Nathan Coco and Andrew Sherman addressing same; Review correspondence from Roy Leaf on potential for cash collateral hearing continuance, and exchange with Megan Proskeur addressing same; Review correspondence from Larry Eide, Counsel for Altera, on Resistance to Motion to Shorten Bar Date.	0.50	\$175.00
1/16/2024	RCG	Review correspondence from Roy Leaf, Debtor Counsel, on continuance relative to hearing on distribution; Review correspondence from Roy Leaf, Debtor Counsel, surrounding hearing on Motion to Shorten Bar Date, and enclosed Hearing Notice and hearing deadline; Participate in hearing on Motion to Shorten Bar Date.	0.90	\$315.00
1/17/2024	RCG	Review Ombudsman's Report addressing concern on Health Information Management (.1); Review Ombudsman's Application for Compensation (.1); Review Application to Employ HBM Management Associates by Official Committee of Pensioners, and prepare correspondence to client addressing objection and delegation of efforts given failure to file certain attendant documents (.3); Review Application for Compensation for H2C Securities, and Notice Setting Bar Date for Objections on same (.2); Review Notice Setting Bar Date for Objections surrounding compensation of Patient Care Ombudsman (.1); Review Notice of Altera Digital Health (.1); Review correspondence from Narendra Ganti on outstanding fee application, discussion with trustee, and prepare responsive correspondence addressing same; Phone call with Janet Reasoner, U.S. Trustee, addressing objection to FTI fees, and considerations on same (.1); Prepare correspondence to client on fee issue and next steps relative to additional communication (.1); Prepare correspondence to Claire Davison, U.S. Trustee Counsel, on objection to FTI fees.	1.40	\$490.00
1/18/2024	RCG	Review Notice of Hearing regarding cash collateral (.1); Review Notice of Hearing regarding authorization of distribution of proceeds from sale (.1); Review Withdrawal of Objection provided by Revology (.1); Note applicable deadlines given hearing dates and court requirements (N/C).	0.30	\$105.00
1/19/2024	RCG	Review correspondence of Andrew Sherman addressing sale closing issues, Altera considerations, and Constituent request, and responsive correspondence of Committee Member.	0.30	\$105.00
1/20/2024	RCG	Review Expedited Motions for Entry of Order, Expedited Motion to Continue Hearing, and attendant Orders (proposed) (667-670, and exhibits) (.4); Review Secured Bondholders Joinder to same (.1); Review Bondholders Joinder and Objection to Motion of Altera (.1); Review Court Order Setting Continuance, Motion for Hearing; review Court Order on Pro Hac Vice Admission (.2); Prepare updated outline of live matters for January 22, 2024 hearing (.2); Review Altera Motion to Assume, Debtor Objection, and notes on same relative to communications with Constituents & position of Committee for presentation at hearing (.6); Prepare correspondence to Andrew Sherman addressing Committee position given correspondence to Committee and exchanges therein (.1); Review correspondence from Roy Leaf, Debtor Counsel, surrounding proposed Orders in connection with motion to extend exclusivity and continuance of hearing and proposed	3.60	\$1,260.00

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## Fees

Date	ID	Description	Time	Bill Amount
		Orders; Review Altera Digital Health reply and further support of motion to compel assumption of rejection of executory contract, and certain attendant authority cited therein relative to considerations on position of Debtor and hearing on Monday and attendant Exhibits A-K (1.6); Review staffing report of ToneyKorf Partners (.1).		
1/21/2024	RCG	Review Renewed Objection of Owens & Minor Distribution (.1); Review Order granting Altera Motion to Seal Exhibits (.1); Review Withdrawal of RMS Holdings Objection to Sale (.1); Review correspondence from Andrew Sherman surrounding negotiations with Debtor & Bondholders & Altera, and responsive correspondence of Constituent relative to settlement (.2); Review correspondence of Nathan Coco, bondholders given Constituent concerns (.1).	0.60	\$210.00
1/22/2024	RCG	Review correspondence from Andrew Sherman surrounding Committee position, and responsive correspondence addressing resolution, and recommendation relative to Committee presentation at the time of hearing and exchanges thereon with Constituents; Round trip travel to/from Cedar Rapids Federal Bankruptcy Courthouse for hearings on Motions to Extend Exclusivity, Motions to Assume and Assign, Motions to Set Final Cure Amount, Motion to Retain H2C & Altera Objections (4.8, billed at 2.4); Meet with Co-Counsel in advance of meeting on considerations relative to financial consultants, plan, waterfall, and evaluation of claims & delegation of efforts, and participate in hearing on behalf of Official Committee of Unsecured Creditors, and post-hearing consult with U.S. Trustee, and counsel for competing stakeholders (2.2).	4.90	\$1,715.00
1/23/2024	RCG	Review correspondence from H2C Securities surrounding proposed deal (Mercy medical equipment); Phone call with Andrew Sherman on communications post-hearing and next steps relative to coordination with parties and stakeholders on plan production (.1); Review correspondences (2) from Andrew Sherman surrounding action items and requirements (.2); Phone call with Andrew Sherman on next steps given requirements (.1); Prepare correspondence to Andrew Sherman on strategy surrounding plan & Committee considerations (.2); Prepare correspondence to Paula Roby, Counsel for Pensioners, on FRE408 meet and confer (.1).	0.80	\$280.00
1/24/2024	RCG	Review correspondence from Andrew Sherman on FTI counter-proposal to Bondholders, and exchanges with Constituents on same (.3); Review enclosed plan settlement proposal & analysis of sale proceeds, and notes on potential waterfall (.4); Review correspondence from Roy Leaf, Debtor Counsel, with enclosed proposed Orders surrounding H2C, 9019(b) settlement, Altera, exclusivity motion, and EverBank motion and enclosed documents; Review correspondence from Narendra Ganti, FTI Consulting, on communication with U.S. Trustee, and prepare responsive correspondence on communication and next steps (.2); Review correspondence from Claire Davison, U.S. Trustee, on position relative to fee objection and split (.1).	1.70	\$595.00
1/25/2024	RCG	Participate in Constituent phone call relative to considerations on counter-proposals, term sheet, and path forward with review of waterfall.	0.70	\$245.00
1/26/2024	RCG	Review correspondence from Emily Keil, Debtor Counsel, on Debtor's Motion to Set Administrative Claims Bar Date (.1); Review draft production of Administrative Claim Instructions, Motion, Proposed Order & Administrative Claim Form (.4); Review correspondence from Andrew Sherman surrounding Committee's proposal for economics of a consensual chapter 11 plan, and enclosed FRE 408 settlement production; On review of correspondence from Andrew Sherman, phone call addressing plan considerations, outstanding negotiations, Pensioner Committee, and considerations relative to D&O Policy and Iowa Law thereon.	0.90	\$315.00
1/28/2024	RCG	Review correspondence from Roy Leaf, Debtor Counsel, surrounding Motion to Set Administrative Deadline.	0.10	\$35.00
1/29/2024	RCG	Review correspondence from Michael Savetsky surrounding post-comments on Motion, Order, and claim form and enclosed redline documents; Review correspondence from Megan Preusker, Bondholder Counsel, on carve out for diminution in value, and exchanges thereto by various stakeholders.	0.50	\$175.00
1/30/2024	RCG	Review correspondence of Roy Leaf, Debtor Counsel, on revised versions of various motions, and enclosed redline copies of Administrative Claims Bar Date Order, and Administrative Claims Bar Date Motion; Review correspondence from Roy Leaf, Debtor Counsel, surrounding additional amendments, and enclosed redline.	0.40	\$140.00
1/31/2024	RCG	Review Debtor's Motion for Entry of Order Establishing Administrative Claims Bar Date, and proposed Order (.2); Review Expedited Motion to Shorten Setting Bar Date and proposed Order (.1).	0.30	\$105.00

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## Fees

Date	ID	Description	Time	Bill Amount
Total Fees: 01/2024			23.40	\$8,140.00
2/2/2024	RCG	Review Notice of Sale Closing filed by Debtor (.1); Review Notice of Hearing on Cash Collateral Motions (.2); Review correspondence from Greg Kopacz surrounding proposed monthly fee application and enclosed documents and amend same to conform with Local Rule requirements (.4); Review correspondence from Narendra Ganti, FTI Consulting, on communications with U.S. Trustee relative to objection to fee application, and prepare responsive correspondence on communications and options relative to moving forward (.3).	1.00	\$350.00
2/3/2024	RCG	Review McKesson Corporation's Motion for Relief from Stay and Directing Distribution of Proceeds, and enclosed exhibits (.2); Review proposed Order addressing same (.1); Review Notice of Hearing on McKesson's Motion (.1); Review Mercy's Motion for Entry of Order authorizing the sale of interest in joint venture free and clear, and Exhibits B & C (.4); Review proposed Order and Notice of Hearing (.2); Review Final Order on Cash Management System bank accounts, purchasing card program (.1); Review Order Approving Third Monthly Application for Patient Care Ombudsman (.1).	1.20	\$420.00
2/5/2024	RCG	Review Court Docket for February 22, 2024 relative to consideration on exhibits (.3); Phone call to Roy Leaf, Debtor Counsel, on likelihood of matters moving forward (.1); Exchanges with Greg Kopacz, Committee Counsel, on considerations relative to fee application and quarterly true up (.2); Prepare correspondence to Claire Davison, U.S. Trustee, on proposed considerations on Consent Order for FTI (.2); Prepare correspondence to Narendra Ganti, FTI, and communications with U.S. Trustee (.1).	0.90	\$315.00
2/6/2024	RCG	Review Application for Compensation of Nyemaster Law Firm, and bar date on same (.2); Review Application to Employ CBRE and hearing setting objection deadlines on same (.3); Review correspondence from Andrew Sherman addressing outstanding settlement proposal, and Cash Collateral Hearing, and responsive correspondence of Nathan Coco, addressing same.	0.70	\$245.00
2/7/2024	RCG	Review correspondence from Andrew Sherman on communications with Debtor, and prepare responsive correspondence on his questions surrounding outreach with Pensioners; Phone call with Andrew Sherman addressing negotiations with bondholders, considerations on Pension Committee negotiation, and question surrounding D&O policy research delegation (.2); Phone call to Paula Roby, Counsel for Mercy Pensioners, and prepare correspondence surrounding negotiation with Pension Committee (.2); Phone call from Andrew Sherman addressing February 22 time slot, and position surrounding objection deadline on distribution motion (.1); Prepare correspondence to Andrew Sherman and Boris Mankovetskiy surrounding February 22nd Docket, court production, and considerations on witness and exhibits (.2).	0.90	\$315.00
2/8/2024	RCG	Phone conference with Paula Roby, Counsel for Pensioners, Andrew Sherman & Boris Mankovetskiy, OCUC Counsel, surrounding Pensioner Committee intersection with Creditor Committee, and strategies moving forward (.5); Phone call to Andrew Sherman surrounding specific requirements of Creditor's Committee, and production of information of Pensioners Committee as soon as possible (.2); Prepare correspondence to Paula Roby addressing Creditor Committee production and understanding from call, against notes on call (.2); Phone call from Paula Roby, Counsel for Pensioners, surrounding information production and next steps (.1); Review correspondence from Greg Kopacz, Committee Counsel, relative to fee applications for November and December and enclosed applications, and amend to conform with Local Rule requirements & In Re Pothoven for November and December (.6).	1.60	\$560.00
2/9/2024	RCG	Review correspondence from Andrew Sherman addressing extension on challenge deadlines (.1); Prepare witness & exhibit list for hearing on February 22, 2024 given understood issues (.4); Prepare correspondence to Andrew Sherman on proposed witness & exhibit list (.1); Review declarations of Nyemaster & McDermott surrounding positions on disinterestedness and declarations on same (.2); Review application for compensation of Patient Care Ombudsman, and notice setting bar date for applicable deadlines (.2); Review final application of Patient Care Ombudsman, and notice setting bar date for objections (.2); Review correspondence of Megan Preusker, Counsel for Bondholders, on position surrounding challenged eight, discovery stand still and objection deadline, and enclosed proposed stipulation, and exchanges with Andrew Sherman addressing same.	1.50	\$525.00
2/9/2024	VT	Research Iowa authority regarding duties owed to a non-profit by its board of directors and	3.00	\$600.00

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### Fees

Date	ID	Description	Time	Bill Amount
		officers; research Iowa authority regarding legal standard to use against non-profit board of directors and officers for breach of duty, negligence, and gross negligence.		
2/10/2024	RCG	Review exhibit list filed by Debtor, and attendant exhibits relative to impact on Committee production via reference to Docket Nos. 27, 713 (.4); Review exhibit list submitted by Bondholders (reservation list) (.1); Review court correspondence on fourth and fifth Applications for Compensation, of Sills Cummis & Gross and notice of bar date on same (.2); Review court correspondence on exhibit list pleaded by Committee (.1).	0.80	\$280.00
2/11/2024	RCG	Review correspondence from Andrew Sherman on on-going negotiations with Debtor & Pension & Preston Hollow, considerations on applicable deadlines and required filings and enclosed document.	0.30	\$105.00
2/12/2024	RCG	Review correspondence from Andrew Sherman, addressing Pensioner requests and turnover of documentation; Review preliminary research relative to D&O Liability Memorandum, and against same, shepardize Iowa Code Sections 504.832, 831 & case authority related to Director protections, and update legal evaluation and identify additional informational needs (1.2); Review correspondence from Andrew Sherman addressing challenge period, deadlines for negotiations with Preston Hollow and draft complaint (.2); Prepare redline changes to lien challenge & affirmative claims complaint (.7); Prepare correspondence to Andrew Sherman and Boris Mankovetskiy addressing: redline complaint, and evaluation of potential D&O claims given Iowa Code Section 504 & case authority requirements, and enclosed redline changes & legal authority (.2); Review correspondence from Roy Leaf, Debtor Counsel, on proposed Order on administrative claims and enclosed documents.	2.70	\$945.00
2/13/2024	RCG	Review Notice of February 22, 2024 Hearing on Exclusivity Motion (.1); Review Proceeding Memo and Order regarding administrative claims bar date (.1); Review court Order establishing administrative claims bar date and approving for manner and sufficiency of Notice and incorporated form (.2); Review correspondence from Andrew Sherman on discovery standstill & production of information; Review correspondence from Andrew Sherman addressing communications with Pension Committee, and authority relative to Committee position (.1); Shepardize authority relative to plan treatment and notes on same (.4).	1.00	\$350.00
2/14/2024	RCG	Review correspondence from Constituents surrounding Adversary Complaint, considerations on preliminary injunction, and responsive correspondence of Andrew Sherman on same (.2); Review correspondence of Andrew Sherman addressing negotiation with Preston Hollow, extension on challenge deadline, and responsive correspondence of Nathan Coco, Counsel for Preston Hollow, addressing same (.2); Review correspondence from Andrew Sherman on proposed stipulation with Preston Hollow, and considerations on coordination and exchanges thereon relative to ultimate hearing; Review correspondence from Andrew Sherman on competing plans and requirements of Committee (.1); Review correspondence of Megan Preusker addressing court reconvene and position on stipulation and exchange with Andrew Sherman (.2); Review correspondence from Narendra Ganti, FTI, on financial advisor conference relative to term sheet.	1.10	\$385.00
2/15/2024	RCG	Review correspondence from Andrew Sherman addressing plan negotiation, and exchanges with Daniel Simon, Debtor's Counsel, on same (.3); Review correspondence from Narendra Ganti, FTI, on compromise with trustee and prepare responsive correspondence with draft order (.2); Prepare draft order relative to U.S. Trustee's Objection and Release of FTI funds (.3); Participate in plan terms negotiation conference with Dan Simon & Felicia Pearlman, Debtor Counsel, Nathan Coco & Megan Preusker, Counsel for Preston Hollow.	1.70	\$595.00
2/16/2024	RCG	On review of notes from discussion related to potential term sheet, prepare correspondence to Andrew Sherman and Boris Mankovetskiy addressing negotiation points, UCC entitlement relative to economic stakeholder positions, and considerations relative to administration given previous research on potential claims.	0.30	\$105.00
2/17/2024	RCG	Review correspondence from Roy Leaf, Debtor Counsel, surrounding position of Debtors on payment of administrative costs surrounding workers' compensation trust, and enclosed proposed Motion & Order.	0.20	\$70.00
2/18/2024	RCG	Review Notice of Deadline for administrative claims.	0.10	\$35.00
2/19/2024	RCG	Review correspondence from Kristina Stanger, Debtor Counsel, on revised Motion and Orders (.1); Review correspondence from Megan Preusker, Counsel for Preston Hollow, on considerations relative to challenged deadline and final hearing and enclosed proposed stipulation	1.30	\$455.00

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Date	ID	Description	Time	Bill Amount
		and agreement regarding cash collateral (.2); Review correspondence from Andrew Sherman addressing proposed stipulation; Review correspondence from Andrew Sherman relative to fee issues for Sills Cummis & Gross and responsive correspondence of Claire Davison, U.S. Trustee, addressing same; Prepare draft Order on Compromise relative to FTI payment and Fee Application (.5); Review correspondence from Narendra Ganti, FTI, on outstanding Order, and prepare responsive correspondence with draft Order, and exchanges thereon for production to U.S. Trustee (.2).		
2/20/2024	RCG	Review correspondence from Narendra Ganti, FTI, on proposed amendments to Consent Order, and incorporate same and prepare correspondence to Claire Davison, U.S. Trustee, on proposed Consent Order and procedure for submission; Review Application for Compensation of H2C Securities and Notice setting applicable bar date deadlines (.2); Review Notice of proposed Agreed Order Resolving McKesson Distribution Motion, and Agreed (Consented) proposed Order (.2); Review Motion for Entry of Order regarding Workers' Compensation payments, and enclosed exhibits (trust) & proposed Order, and Notice Setting Bar Date on same (.3); Review correspondence from Megan Preusker, Counsel for Bondholders, on Mercy cash collateral extension, second amended stipulation, and enclosed document, and responsive correspondence of Roy Leaf, Debtor Counsel, addressing same.	1.20	\$420.00
2/21/2024	RCG	Review Court Order Granting in part FTI Consulting Third Fee Application, and prepare correspondence to FTI addressing same (.2); Review ToneyKorf Partners staffing report for January 2024 (.1); Review Notice of Continuation of Hearing on Final Cash Collateral Order, against prior draft circulated given representations of Kristina Stanger, Debtor Counsel (.2); Review correspondence from Andrew Sherman surrounding considerations on Debtor's proposed plan, negotiations with Bondholders; Review correspondence from Dan Simon, Debtor Counsel, on position surrounding production of plan, negotiation and exchanges with Andrew Sherman throughout day on same (.2); Review correspondence from Andrew Sherman surrounding production of privileged information & negotiation with Bondholders and exchanges thereon (.2); Review correspondence from Andrew Sherman on proposed Committee plan settlement term sheet, and analysis of sales proceeds, and enclosed documents with notes addressing same.	1.50	\$525.00
2/22/2024	RCG	Review correspondence from Andrew Sherman surrounding negotiation with Bondholders, issues with Debtor, production of information, and responsive correspondence of Constituents surrounding engagement with Bondholders; Review Motion to Continue, and Order Continuing Hearing to March 27, 2024 (.2); Review Monthly Operating Report issued by Debtor, against prior reports relative to free cash & potential against plan term sheets being circulated, with notes on same (.4); Use of support document to Motion to Sell JV and enclosed Purchase Agreement (.2); Phone call with Andrew Sherman on competing plan, Pension Committee and considerations on treatment.	1.20	\$420.00
2/23/2024	RCG	Review correspondence from Claire Davison, U.S. Trustee Counsel, on proposed Orders and exchanges with Andrew Sherman and enclosed Orders relative to fee applications.	0.20	\$70.00
2/24/2024	RCG	Review correspondence of Roy Leaf on draft orders on rejection of Steindler Contract, and proposed Order (.2); Review correspondence from Roy Leaf on Motion to shorten objection time on disclosure statement, and proposed Order (.2); Review correspondences from Andrew Sherman addressing proposed Order on DS, and position of Committee (.2); Review correspondences of Dan Simon and Roy Leaf regarding Disclosure Statement Hearing and draft Motion, and exchanges thereon (.3).	0.90	\$315.00
2/25/2024	RCG	Review correspondence of Andrew Sherman addressing revised redline order, and enclosed order, and exchanges with Roy Leaf on same (.2); Review Combined Plan & Disclosure Statement filed on the docket (Dkt #760) and notes on same re: OUCC placement, structure (waterfall), issues on timing, points of negotiation, and questions for FA & Pension Committee (2.7).	2.90	\$1,015.00
2/26/2024	RCG	Review correspondence from Andrew Sherman on Debtor's filed plan of liquidation and proposed revisions relative to Order on Motion to Shorten Deadline and enclosed document; Participate in phone conference with Paula Roby, Pensioners Committee, and Andrew Sherman addressing Debtor's plan, Pensioner Committee interest, and negotiation relative to dual trusts (.6); Phone call with Andrew Sherman surrounding: potential for mediation, Judge Collins position on Disclosure Statement, and timing considerations prior to large administrative expense burn (.3); Participate in	1.60	\$560.00

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## Fees

Date	ID	Description	Time	Bill Amount
		phone conference with Constituents on strategy relative to mediation potential, considerations on negotiations, and potential waterfall and analysis therein.		
2/28/2024	RCG	Review correspondence from Andrew Sherman surrounding proposed communication to stakeholders on deficiencies and plan, and review applicable case citations (.4); Review proposed request for status conference (.1); Review Committee responses relative to production (.1); Prepare correspondence to Andrew Sherman addressing local practice, requests of the court, and requirements relative to filing (.2); Review correspondence from Roy Leaf, Debtor Counsel, addressing proposed Order and enclosed production; Review correspondence from Andrew Sherman on revisions to Request for Status Conference, review redline, and prepare responsive correspondence on proposed Order and communications with Chambers; Prepare correspondence to Andrew Sherman addressing considerations on Motion, exchanges thereon and amend Motion for filing; Review correspondence of Andrew Sherman addressing Constituents relative to concerns on plan (.1); Review correspondence of Andrew Sherman to Paula Roby, Counsel for Pensioners, addressing communications and concerns (.1).	1.80	\$630.00
2/29/2024	RCG	Review Notice of Hearing regarding Disclosure Statement (.1); Review court correspondence on Request for Telephonic Status Conference (.1); Review Proceeding Memo on Motion to Assume and Reject Executory Contract (.1); Review Order Authorizing Rejection of Executory Contracts (.1); Review Order Approving Sale Mercy Services Iowa City 25% interest in Progressive Rehabilitation and Associates (.3); Review Court Order Authorizing Employment and Retention of CBRE (.2); Review Order Expanding Scope of Retention of EPIQ (.1); Review Agreed Orders on Fourth and Fifth Applications of Compensation for Sills Cummis & Gross (.2); Review Court Order Approving Reimbursement and Compensation for Patient Care Ombudsman (.1); Phone call to Chambers surrounding hearing (.1); Prepare proposed Order and correspondence to parties in interest on same (.3); Phone call with Paula Roby, Counsel for Pensioners, on: request for status conference, potential on mediation, considerations relative to plan treatment, and costs surrounding mediation; Review correspondence from Roy Leaf, Debtor Counsel, on proposed Order; Review correspondence from Andrew Sherman surrounding meet & confer relative to position on mediation (.1); Phone conference with Andrew Sherman addressing: presentation to court on Motion for Mediation, considerations relative to various stakeholders, communications with Constituents, and Pensioners (.4).	2.70	\$945.00
<b>Total Fees: 02/2024</b>			<b>34.30</b>	<b>\$11,555.00</b>
3/2/2024	RCG	Review Second Motion to Reject Contracts filed by Debtor, and enclosed proposed Order and Identification of Rejected Contracts & Rejection Notice (.3); Review Notice of Hearing regarding Motion to Reject Contracts and applicable deadlines (.1); Review Third Motion to Reject Certain Unexpired Executory Contracts and Leases, proposed Order, rejected contracts, and Rejection Notice (.3); Review Notice of Hearing on Motion for Entry of Order Authorizing Rejection (.1); Review Court Order Setting Telephonic Status Conference (.1); Review Fourth Motion to Reject Lease on Expired Executory Contracts, proposed Order and rejected contracts, Rejection Notice, against Third Motion (.3); Review Notice of Hearing regarding Motion to Reject (.1); Review Fifth Motion to Reject Leases or Executory Contracts and attendant exhibits, Sixth Motion to Reject Lease with Contracts and exhibits, Seventh Motion, applicable Notice, Eighth Motion and exhibits and Ninth Motion and exhibits, with notes on same relative to Constituents.	2.00	\$700.00
3/3/2024	RCG	Review Debtor's Motion for Entry of Order Approving Disclosure Statement, Scheduling Hearing, and Requested Relief (27 pages) (.4); Review proposed Solicitation Procedures Order (135 pages) and notes on same (1.7).	2.10	\$735.00
3/4/2024	RCG	Review Motion of Iowa City Ambulatory Surgical Center for Relief from Stay (Joint Venture Partner), and Court Order Setting Bar Date for Objections (.2); Review Court Order Granting Final Fee Application of Patient Care Ombudsman (.1); Review Debtor's Second Motion for Entry of Order Extending Exclusivity Period (.2); Review proposed Order and Notice (.2); Participate in phone conference with Dan Simon and Roy Leaf, Debtor Counsel, Paula Roby, Counsel for Pensioners, and Nathan Coco, Counsel for Bondholders, on considerations relative to request for third party neutral, and negotiation on resolution (.4); Prepare correspondence to Andrew Sherman on presentation to court for status hearing, and phone call on same (.3).	1.40	\$490.00
<b>Total Fees: 03/2024</b>			<b>5.50</b>	<b>\$1,925.00</b>



**Statement of Account**

MERCY Mercy Hospital, Iowa City, Iowa, et al  
 000001 Mercy Hospital, Iowa City, Iowa, et al

11/01/2023 - 03/04/2024  
 Time & Rate: Bill Value

**Fees**

Date	ID	Description	Time	Bill Amount
Total Fees:			111.10	\$38,385.00

**Costs and Expenses**

Date	Description	Orig Expense	Orig Cost	Bill Amount
11/20/2023	Travel to and From Hearing in Cedar Rapids, IA		\$176.85	\$176.85
11/30/2023	Miscellaneous Expense- Parking		\$1.50	\$1.50
Total Costs/Expenses: 11/2023		\$0.00	\$178.35	\$178.35
01/31/2024	Travel to and from hearing in Cedar Rapids 1/22/24		\$182.24	\$182.24
Total Costs/Expenses: 01/2024		\$0.00	\$182.24	\$182.24
02/08/2024	Miscellaneous Expense- Parking		\$3.75	\$3.75
Total Costs/Expenses: 02/2024		\$0.00	\$3.75	\$3.75
Total Costs/Expenses:		\$0.00	\$364.34	\$364.34

**Other Accounting**

Date	Description	Amount
12/13/2023	Trust Applied as Payment	\$23,064.79

MERCY Mercy Hospital, Iowa City, Iowa, et al  
000001 Mercy Hospital, Iowa City, Iowa, et al  
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03/05/2024 - 05/30/2024  
Time & Rate: Bill Value

### Fees

Date	ID	Description	Time	Bill Amount
3/5/2024	RCG	Review correspondence from Andrew Sherman addressing communications to Committee, requirements relative to settlement conference, and responsive correspondence of Constituents; Review correspondence from Andrew Sherman on proposed communications to Paula Roby/Simon/Leaf/Coco on issues raised at the time of status conference, and against review of notes, prepare responsive correspondence on informational production and issues needing addressed given representations; Participate in telephonic status conference before the court (.9); Phone call with Andrew Sherman on action items given representations by counsel, delegation of efforts, and considerations in advance of informal mediation (.3).	1.70	\$595.00
3/6/2024	RCG	Review Court Memorandum and Order on Status Hearing and requirements of parties (.1); Prepare correspondence to Andrew Sherman addressing Disclosure Statement of Hearing on March 27, 2024 and exchanges thereon; Review correspondence from Jacob Park, FTI Consulting, on fee applications, and upon review, prepare responsive correspondence on deficiencies in production relative to Local Rules (.2); Review draft fee applications, and amend to conform with Local Rule for three months (.4); Prepare Notice of Fee Applications to support Motions (.4); Given communications with parties re: mediation, prepare outline of specific legal points requiring support in advance of mediation (.4).	1.70	\$595.00
3/7/2024	RCG	Review correspondence of Roy Leaf, Debtor Counsel, surrounding informal resolution, and exchanges of the parties on same (.2); Review court correspondence on FTI Fee Application (3) and Notice Setting Bar Date for objections (.2); Review court correspondence on Cutler Application for Compensation and applicable deadlines through Notice (.2).	0.60	\$210.00
3/8/2024	RCG	Phone call with Andrew Sherman addressing Plan Solicitation Agreement; Review correspondence from Roy Leaf, Debtor Counsel, on proposed Order relative to informal mediation, and proposed Order and exchanges thereon (.2); Phone call with Andrew Sherman addressing term sheet, presentation to mediator & considerations on confirmation (.2).	0.50	\$175.00
3/11/2024	RCG	Review correspondence from Andrew Sherman on Plan Support Agreement (.1); Review Plan Support Agreement, noting Fiduciary Out (provision 10) and preliminary research on same (.4); Phone call with Andrew Sherman on Plan Support Agreement, considerations relative to extent of security interested bondholders (.2); Prepare correspondence to Andrew Sherman on PSA, Fiduciary Out language, and production, and his response addressing same.	0.90	\$315.00
3/11/2024	VT	Research circuit court rulings when parties enter into a plan solicitation agreement prior to the court approving a disclosure statement.	2.00	\$400.00
3/12/2024	RCG	Review correspondence from Andrew Sherman surrounding proposed redline to existing plan, and alternative treatments, and review redline provisions and notes on same; Review First Motion objecting to discharge filed by Iowa Insurance Division.	0.60	\$210.00
3/13/2024	RCG	Review correspondence from Andrew Sherman addressing Constituents on March 18, 2024 settlement conference, with proposed revised plan; Phone call with Andrew Sherman surrounding negotiations with Debtor, witnesses and exhibits at the time of hearing on disclosure statement (.2); Prepare witness and exhibit list with applicable reservations (.3).	0.70	\$245.00
3/14/2024	RCG	Review Debtor's Exhibit and Witness List, against prior Witness and Exhibit List relative to evidentiary production (.2); Review Bondholders' Witness and Exhibit List, against prior Witness and Exhibit List (.2); Review Notice of Appearance for Internal Revenue Service (.1); Review Application of counsel to Debtors for AntiTrust activities, on Application for Compensation, and applicable Notice Setting Bar Date on same (.2); Participate in phone conference with Paula Roby & Mark Ross, Pension Committee, and Andrew Sherman, Creditor Committee, on negotiation & discussion surrounding valuations.	1.50	\$525.00
3/15/2024	RCG	Against Amended Complaint, Witness and Exhibit List, and conference, address evidentiary requirements of Committee at March 27, 2024 Hearing, notes on same, and question surrounding FTI opinions (.9); Prepare correspondence to Andrew Sherman addressing Amended Complaint, specific requirements of FTI in advance of hearing on Disclosure Statement, and recommendations on meeting on Monday (.2); Review correspondence from Michael Savetsky on Amended Complaint (.1); Review Amended Complaint, with attention to Plan Support Agreement amendments	1.50	\$525.00

## Statement of Account

MERCY Mercy Hospital, Iowa City, Iowa, et al  
 000001 Mercy Hospital, Iowa City, Iowa, et al

03/05/2024 - 05/30/2024  
 Time & Rate: Bill Value

## Fees

Date	ID	Description	Time	Bill Amount
		(.3).		
3/17/2024	RCG	Review correspondence from Greg Kopacz on proposed fee application and production to court (.1); Review proposed fee application, and prepare amendments to conform with Local Rules, case Order on ordinary course of professional fees, and Ray Pothoven (.4).	0.50	\$175.00
3/18/2024	RCG	Attend court sponsored settlement conference, inclusive of pre-conference discussions with co-counsel, and post-conference discussions with opposing counsel.	5.70	\$1,995.00
3/19/2024	RCG	Review correspondence from Andrew Sherman, surrounding extension of challenge deadlines, and Motion to Object to Distribution, responsive correspondence to Nathan Coco addressing same; Roundtrip travel time to-from work to Cedar Rapids Courthouse (4.8); Participate in settlement conference with Stakeholders on attempts at resolution; Review correspondences (2) from Claire Davison, U.S. Trustee Counsel, on fee considerations (.2); Prepare correspondence to Narendra Ganti, FTI, on U.S. Trustee position and ability to reach accord (.2); Review correspondence from Andrew Sherman on applicable filings given lack of response on challenge deadline and responsive correspondences on same (.2); Review correspondence of Megan Preusker on extension of time on deadlines (.1); Review correspondence from Andrew Sherman on background negotiation between parties and enclosed exchanges (.2).	4.10	\$1,435.00
3/20/2024	RCG	Review correspondence from Roy Leaf, Debtor Counsel, addressing compromise relative to applicable March 20th deadlines, and exchanges with Megan Preusker, Counsel for Preston Hollow, & Boris Mankovetskiy, OCUC Counsel, addressing same; Review correspondence of Andrew Sherman addressing ongoing plan negotiation, communications to Constituents & responsive correspondence on same and exchanges therein.	0.60	\$210.00
3/21/2024	RCG	Review Notice Setting Bar Date for Objections extending challenged deadline and deadline to object to Distribution Motion to March 25 (.1); Review Notice Setting Hearing on Debtor's Motion for Entry of Order addressing workers' compensation program (.1); Review compensation report of ToneyKorf Partners (.2); Review staffing report of ToneyKorf Partners (.1); Review correspondence from Andrew Sherman addressing counter-proposal of Preston Hollow, and enclosed communications of parties (.2); Review Bondholder comments to Combined Disclosure Statement and Plan, and notes on same relative to discussions on March 18, 2024 (.9); Phone call with Andrew Sherman addressing Bondholders production, communication with Constituents and Committee position, and necessary additional parties (.2); Phone call to Paula Roby, Counsel for Pensioners, on Bondholders response (.1); Review correspondence from Andrew Sherman addressing considerations on retention and enclosed Declaration (.2); Prepare Declaration in conformance with requirements of Local Rules relative to settlement to Order on Application to Employ (.3); Review court correspondence on Declaration, and prepare correspondence to Andrew Sherman addressing Declaration, and requirements relative to ongoing negotiation and enclosed Declaration (.2); Against communication from FTI, prepare proposed Consent Order on FTI Fee Applications (3, 4, and 5) (.6); Prepare correspondence to Claire Davison, U.S. Trustee Counsel, on proposed Order, request on redline (.1); Prepare correspondence to FTI addressing communications with U.S. Trustee, proposed Order and wire requirements (.2).	3.50	\$1,225.00
3/22/2024	RCG	Review correspondence of Andrew Sherman addressing communications to Constituents surrounding negotiation with Preston Hollow, and requirements relative to Constituent communication & proposed objections (.2); Review proposed objection to Disclosure Statement, and Shepardization of Second Circuit, Third Circuit, and Delaware specific case authority, and notes addressing disparate treatment of Preston Hollow relative to values, pension and creditors Committee treatments (1.3); Review supplemental objection to Section 506(c) surcharge rights & equities in the case exception, and research surrounding 552(b) (.6); Review objection to Preston Hollow distribution of proceeds Motion (.2); Review correspondence from Narendra Ganti, FTI, on position surrounding payment (.1); Review correspondence from Claire Davison, U.S. Trustee Counsel, on redline changes to Order, review Order, and phone call on same and finalize (.3); Prepare correspondence to Chambers addressing Order (.1); Prepare correspondence to client addressing reservation of rights & U.S. Trustee position, and considerations on subsequent fee applications (.2); Prepare correspondence to Dan Simon & Roy Leaf, Debtor Counsel, on outstanding obligations of Debtor given Court Order (.2); Review correspondence from Andrew Sherman on plan negotiation, and phone call on same.	3.40	\$1,190.00
3/23/2024	RCG	Review Debtor's Response and Objection to Motion of Iowa City Ambulatory & Surgical Center on	1.50	\$525.00

## Statement of Account

MERCY Mercy Hospital, Iowa City, Iowa, et al  
000001 Mercy Hospital, Iowa City, Iowa, et al

03/05/2024 - 05/30/2024  
Time & Rate: Bill Value

## Fees

Date	ID	Description	Time	Bill Amount
		Motion for Relief from Stay (.2); Review Monthly Operating Report covering February, against prior January report relative to cash usage for considerations within waterfall (.2); Review Objection to MWE Fee Application filed by U.S. Trustee (5th and 6th monthly fee applications) (.2); Review Court Order granting in part FTI Consulting (3rd, 4th and 5th fee applications) (.1); Review support document surrounding Disclosure Statement filed by Debtor with amended liquidation analysis (Exhibit 1), certain assumptions, against prior Exhibit 1 and notes on same noting confusion relative to revisions (.4); Review Preston Hollow Joinder in Debtor's response to Iowa City Ambulatory & Surgical Center's Motion for Relief from Stay (.1); Review correspondence from Narendra Ganti, FTI Consulting, on question surrounding ancillary litigation, and prepare responsive correspondence addressing questions relative to tort litigation, opposing counsel, and FTI fee applications.		
3/24/2024	RCG	Review correspondence from Andrew Sherman on competing proposals of Preston Hollow & Debtor, position on Committee, and responsive correspondence of Dan Simon, Debtor Counsel, addressing same; Review correspondence from Narendra Ganti, FTI, surrounding obligations to FTI.	0.30	\$105.00
3/25/2024	RCG	Review correspondences (2) from Committee Members surrounding position on counter-proposal and responsive correspondence of Andrew Sherman addressing same relative to procedure moving forward (.2); Review correspondence from Andrew Sherman on plan negotiation, and exchanges thereon relative to Committee position and Hearing on March 27, 2024 (.2); Review correspondence from Andrew Sherman surrounding considerations on negotiations, and exchanges thereon (.2); Phone call with Paula Roby, Counsel for Pensioners, on Pensioners Committee against Preston Hollow proposal of 321 and discussion thereon (.2); Participate in conference with FTI relative to obligations (.1); Participate in Committee call addressing outstanding proposal, situation of parties, and strategy moving forward (.4); Prepare correspondence to Andrew Sherman addressing proposed filings, procedure, and requirements (.1); Review correspondence from Boris Mankovetskiy addressing Complaint and procedure (.1); Review correspondences of Boris Mankovetskiy, OCUC Counsel, addressing revisions and requirements (.2); Phone call with Paula Roby, Pensioners Committee, on Adversary Complaint and Motion Practice (.1); Review correspondence from Andrew Sherman, OCUC Counsel, surrounding proposed changes to pleadings and phone call addressing same (.2); Prepare revisions to: Adversary Complaint & production of Cover Page, Objection to Disclosure Statement, Objection to Distribution Motion, and Objection to Surcharge and Waiver, for submission to bankruptcy court (1.6); Review court correspondence on Adversary Complaint, and prepare correspondence to client addressing same (.2); Review correspondence from Michael Savetsky surrounding production of documents (.1); Review court correspondence on Objection to Disclosure Statement, Objection to Distribution Motion, and Objection regarding Waiver and Surcharge, and prepare correspondence to client addressing same; Review correspondence from Dan Simon, Debtor Counsel, surrounding position on Disclosure Statement shortcomings, and exchanges with Andrew Sherman, OCUC Counsel, addressing same; Review correspondence from Andrew Sherman on proposed communications on negotiation, and responsive correspondence of Narendra Ganti, FTI, on same; Participate in phone conference with Andrew Sherman, OCUC Counsel, and Paula Roby, Pensioners Committee, on considerations relative to Committee Objection to Disclosure Statement, position on security interest of parties and strategy relative to working towards resolution (.3); Phone call with Andrew Sherman on local practice requirements, evidentiary production, and presentation (.2); On communications with Andrew Sherman, prepare outline relative to specific points on Disclosure Statement given objection, and outside considerations relative to Pensioners position on administration, disparate treatment, and code requirements given plan solicitation agreement (1.0); Review correspondence from Roy Leaf, Debtor Counsel, on proposed continuance, and phone call with Paula Roby, Pensioners Committee, addressing same.	6.30	\$2,205.00
3/26/2024	RCG	Review MediRevv Reservation of Rights (.1); Review U.S. Trustee Objection to Debtor's Combined Disclosure Statement (.1); Review (second) Reservation of Rights filed by MediRevv, against first (.1); Review Motions to Appear Pro Hac Vice (3) (.2); Review Objection of MercyOne to Debtor's Combined Disclosure Statement and Joint Chapter 11 Plan of Liquidation, review certain cases cited therein, and notes on same relative to hearing on March 27, 2024 (.4); Review Expedited Motion to Continue Hearing on Cash Collateral and Distribution Motion, and Proposed Order, provided by Debtor (.2); Review correspondence from Andrew Sherman addressing Pension	2.50	\$875.00

## Statement of Account

MERCY Mercy Hospital, Iowa City, Iowa, et al  
000001 Mercy Hospital, Iowa City, Iowa, et al

03/05/2024 - 05/30/2024  
Time & Rate: Bill Value

## Fees

Date	ID	Description	Time	Bill Amount
		Committee (.1); Review correspondence of Roy Leaf, Debtor Counsel, surrounding Order for Cash Collateral (.1); Review correspondence from Bradley Tuttle, EPIQ Managing Director, on invoicing, and enclosed document; Review correspondence from Nathan Coco, Counsel for Preston Hollow, addressing proposed Order (.1); Review correspondence from Michael Savetsky on negotiations with Bondholders, and enclosed counter-proposal, against prior proposal relative to benefit to Estate and notes on same (.3); Participate in settlement conference call with Bondholders, Debtor, and Creditors Committee; Phone call with Paula Roby, Pensioners Committee, addressing treatment, negotiations with Bondholders and Pensioners Committee (.2); Phone call with Andrew Sherman on evidentiary presentation & communications with Pensioners (.2).		
3/27/2024	RCG	Review correspondence from Dan Simon, Debtor Counsel, on proposed draft plan and disclosure statement, and enclosed redline production impacting inter-company claims, validity extent and priority of liens, additional disclosures opt out election, background on Substantive Consolidation and statement surrounding assumptions on Debtor's liquidation analysis, and notes on same (1.2); Review correspondences from Constituents addressing considerations on negotiation (.2); Attend Hearing in Cedar Rapids, Iowa, to include pre-hearing negotiation, and post-hearing discussions on resolution of disclosure statement issues, Committee objections, and Committee Adversary Complaint; Round-trip travel time to-from work to Cedar Rapids Courthouse (4.8).	8.20	\$2,870.00
3/28/2024	RCG	Review correspondence from Emily Keil on revisions to Iowa City Ambulatory Center's Motion for Relief from Stay, proposed Order and enclosed redline; Review correspondence of Andrew Sherman addressing Pensioners Committee claim, treatment, and responsive correspondence of Paula Roby addressing same (.2); Phone call with Matt Cronin, Catholic Health Initiative-Iowa, Mercy Clinics, & Mercy ACO Counsel, on Disclosure Statement Hearing, case concerns, outstanding objection and requirements of Debtor (.3); Prepare correspondence to Roy Leaf, Debtor Counsel, on outstanding requirements of Debtor, and exchanges thereon, relative to fee applications (.2); Review correspondence from Megan Preusker, Counsel for Preston Hollow, on proposed redline edits and enclosed pages (.2); Review correspondence of Roy Leaf surrounding Confirmation Hearing, and prepare correspondence to Andrew Sherman addressing same (.2); Review correspondence from Andrew Sherman addressing communication with Constituency plan payments, stipulations with Debtor and enclosed documents inclusive of relief from stay and comments on combined plan (.3); Review correspondence from Boris Mankovetskiy on proposed revisions to plan and enclose redline (.6); Review correspondence of Paula Roby, Pensioners Committee, on Boris' changes (.1); Review correspondences (2) from Megan Preusker, Counsel for Preston Hollow, addressing Stipulated Order on sale proceeds and negotiation of deadlines (.2); Review proposed Order granting relief to Bondholder Representatives, and responsive correspondence of Andrew Sherman addressing same and exchanges thereon reaching compromise (.3); Review Stipulation Settlement Agreement with Iowa Insurance Division, and proposed Order (.2); Review Court Order Authorizing Debtors to Administer and Wind Down Workers' Compensation Program (.1); Review documents filed in support of Notice of Appearances (.1).	3.10	\$1,085.00
3/29/2024	RCG	Participate in Iowa City Ambulatory Care's Motion for Relief from Stay; Review correspondence from Andrew Sherman addressing proposed Committee support letter, and enclosed letter for review and edits (.3); Review correspondence of Michael Savetsky on advance pension plan distribution amount and revisions thereto, and responsive correspondence of Paula Roby, Pensioners Committee, addressing same (.2); Review correspondence from Narendra Ganti, FTI, addressing Pensioner claim consideration and values; Review correspondence from Constituents addressing plan support letter (3) and enclosed redline changes; Review correspondence from Nathan Coco, Counsel for Preston Hollow, surrounding issues, responsive correspondence of Dan Simon, Debtor Counsel, addressing same (.2); Review correspondences (2) from Emily Keil, Debtor Counsel, addressing further revisions to plan and disclosure statement and enclosed documents (.4); Review correspondence of Emily Keil, Debtor Counsel, on revised draft of combined Disclosure Statement and Plan, incorporating all changes (redline only) with attention to treatment of Preston Hollow relative to negotiated points in compromise; Review Notice of Appearances filed by Creditor Mercy Health Net (.2); Review Proceeding Memo on Motion to Extend Exclusivity Period (.1); Review Court Order further extending exclusivity periods (.1); Review Court Order Granting Second, Third, Fourth, Fifth, Sixth, Seventh, Eighth and Ninth Omnibus Motions Authorizing Rejection of Executory Contracts (.6); Review correspondence of Dan Simon, Debtor Counsel, surrounding attempts at finalization of revisions, and responsive	3.60	\$1,260.00

## Statement of Account

MERCY Mercy Hospital, Iowa City, Iowa, et al  
 000001 Mercy Hospital, Iowa City, Iowa, et al

03/05/2024 - 05/30/2024  
 Time & Rate: Bill Value

## Fees

Date	ID	Description	Time	Bill Amount
		correspondence of Andrew Sherman on negotiation and responses.		
3/30/2024	RCG	Review U.S. Trustee's Objection to Application for H2C Compensation (.1); Review transfers of claim relative to Constituents (912, 913) (.1); Review correspondence of Emily Keil, Debtor Counsel, on specific language addressing Pensioner's concern and responsive correspondence of Paula Roby, Pensioners Committee, on same (.2); Review correspondence from Dan Simon, Debtor Counsel, on Committee position and responsive correspondence of Michael Savetsky with revisions (.2); Review correspondence of Roy Leaf, Debtor Counsel, addressing proposed Order (.1).	0.70	\$245.00
3/31/2024	RCG	Review Expedited Motion for Order Waiving Local Rule on Final Hearing on Confirmation (.1); Review Notice of Filing of Revisions to Debtor's Combined Disclosure Statement & enclosed First Amended Combined Disclosure Statement and Plan and attendant redline of same, against notes from circulated version (.4).	0.50	\$175.00
Total Fees: 03/2024			56.20	\$19,370.00
4/1/2024	RCG	Review correspondence from Emily Keil, Debtor Counsel, surrounding proposed Solicitation Procedures Order, and accumulative redline and additional comment to UCC letter and enclosed document (.2); Review correspondence of Michael Savetsky on equal treatment between Pensioners Committee & proposed language, and responsive correspondence of Emily Keil addressing same and exchanges thereon with production of revised redline (.3); Review correspondence from Megan Preusker, Counsel for Preston Hollow, on proposed Order granting relief on distribution of sale proceeds to Master Trustee, enclosed document and responsive correspondence of Boris Mankovetskiy addressing same (.2); Review Court Order Canceling Hearing set for 4/1/24 at 10:30 (.1); Review Court Order Granting Debtor's Expedited Motion for Entry of Order (.1).	0.90	\$315.00
4/2/2024	RCG	Review correspondence of Emily Keil, Debtor Counsel, addressing proposed Order Approving Disclosure Statement, scheduling hearing, establishing deadlines, objections, approving solicitation packages and procedures & voting deadline, and enclosed proposed Order addressing voting procedure, solicitation packages, applicable deadlines on claim tabulation (18 pages) (.3); Review Notice of Confirmation Hearing, Notice of Non-Voting Status, Annex 1 addressing Third Party Release, Annex 2 on Release (opt-out) Notice of Non-Voting Status relative to impaired class, Annex 1, Annex 2, Bondholder ballots & instructions, general Unsecureds ballot & instructions, Pension claim ballot and instructions (117 pages) (1.4); Review correspondence from Megan Preusker, Counsel for Preston Hollow, addressing solicitation version of plan & disclosure statement.	1.80	\$630.00
4/3/2024	RCG	Review correspondence from Andrew Sherman on question surrounding fee applications, responsive correspondence addressing procedure and local practice; Review correspondence from Roy Leaf, Debtor Counsel, on proposed Order Approving Disclosure Statement and solicitation procedures, and enclosed proposed Order and applicable deadlines; Review correspondence from Peter Chalik, Counsel for Preston Hollow, on proposed Order Granting Relief to Secure Bondholders Distribution Motion, and enclosed proposed Order (.1); Review correspondences from Michael Savetsky surrounding plan and Disclosure Statement, solicitation procedures, and Committee position addressing same (.2).	0.80	\$280.00
4/4/2024	RCG	Review correspondence from Mike Gustafson, Counsel for ICASC, surrounding Motion for Relief from Stay, and proposed Order, enclosed documents and exchanges with Boris Mankovetskiy on same.	0.30	\$105.00
4/5/2024	RCG	Review correspondence from Jacob Park, FTI, on considerations relative to compensation, and prepare responsive correspondence upon review of request relative to prior compromise and ordinary course order (.3); Review proposed filing, noting discrepancies in monetary requests relative to prior communications with U.S. Trustee & ordinary course order (.3); Review correspondence from Jacob Park addressing FTI fee application, and prepare revisions on same.	0.80	\$280.00
4/10/2024	RCG	Review Motions to Withdraw as Attorney (2) & Supplemental Motions to Withdraw (2).	0.20	\$70.00
4/11/2024	RCG	Review Application for Compensation of Nyemaster, and Notice Setting Bar Date for Objections (.2); Review Application for Compensation filed by McDermott and Notice Setting Bar Date for Objections on same (.2); Review Withdrawal of claim filed by CarePoint (.1).	0.50	\$175.00
4/12/2024	RCG	Review First Application for Compensation of HBM Management, Second Application for	0.40	\$140.00

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Statement of Account

MERCY Mercy Hospital, Iowa City, Iowa, et al  
000001 Mercy Hospital, Iowa City, Iowa, et al

03/05/2024 - 05/30/2024  
Time & Rate: Bill Value

### Fees

Date	ID	Description	Time	Bill Amount
		Compensation and Third Application for Compensation of HBM Management, and applicable Bar Dates.		
4/13/2024	RCG	Review correspondence from Andrew Sherman surrounding communications with Bondholders on Stipulation, and responsive correspondence of Constituents addressing same (.3); Review proposed Stipulation and Agreement staying Adversary Proceeding and considerations therein (.2).	0.50	\$175.00
4/16/2024	RCG	Review First Application for Fees submitted by Paula Roby, Counsel for Pensioners Committee, and Noticing Bar Date for Objections (.2); Review Second Application for Fees of Counsel for Pensioners Committee, and Bar Date Setting Applications (.2).	0.40	\$140.00
4/18/2024	RCG	Review correspondence from Peter Chalik, Counsel for Bondholders, on opposed Order relative to Stipulation and Agreement on Adversary Proceeding and enclosed documents; Review Court Order Granting Motion to Withdraw as Attorney (.1); Review Application for Compensation filed by Fifth Third Securities & support document thereto (.2).	0.50	\$175.00
4/19/2024	RCG	Review correspondence from Claire Davison, UST, on FTI 6th Fee Application, and proposed Order addressing same (.2); Prepare correspondence to Narendra Ganti, FTI Consulting, on UST proposal, against prior considerations, and his response on same (.2); Prepare correspondence to Claire Davison, UST, on proposed Order; Review Notice setting bar date for objections and applicable deadlines relative to H2C Securities fee application (.1); Review Stipulated Joint Motion, and proposed Order and Stipulation (.2).	0.80	\$280.00
4/21/2024	RCG	Review correspondence from Claire Davison, UST Counsel, on proposed Order relative to FTI fees, and enclosed Order.	0.10	\$35.00
4/23/2024	RCG	Review correspondence from Boris Mankovetskiy on proposed Liquidation Trust Agreement, and responsive correspondence of Emily Keil, Debtor Counsel, surrounding plan supplement deadline (.2); Review draft Liquidation Trust Agreement, noting applicable releases, redline changes, considerations on revisions & local requirements and intersection of Trust Oversight Committee, and notes on same (Schedule 1 and Schedule 2 left blank) (1.2); Review Court Order approving stipulation staying adversary proceeding (.1); Review Application for Compensation of H2C Securities (.1); Review staffing report of ToneyKorf Partners (.1); Review Notice Setting Bar Date for Objections to H2C Securities fee application and applicable deadlines (.1); Review Notice of Hearing on Application for Compensation of ordinary course professional (.1); Review Official Committee of Pensioners Rule 3018(a) Motion (.1).	2.00	\$700.00
4/25/2024	RCG	Review correspondence from Emily Keil, Debtor Counsel, on redline to Liquidation Trust Agreement, and enclosed redline changes; Review April 15, 2024 correspondence of EPIQ surrounding administrative requirements and enclosed document; Review correspondence from Andrew Sherman surrounding draft Liquidation Trust Agreement incorporating Debtor's comments, and Plan Oversight Committee and enclosed document against original relative to Compare (.6); Review Constituent correspondence on proposed treatment (.1); Review correspondence from Roy Leaf, Debtor Counsel, on proposed Motion addressing Local Rule 3018-1 for evidentiary production at the time of hearing on plan confirmation and enclosed document (.2); Review correspondence from Boris Mankovetskiy on additional redline changes to Mercy Liquidation Trust Agreement and enclosed redline.	1.50	\$525.00
4/28/2024	RCG	Review Order on FTI fees (.1); Review Chapter 11 MOR (3/31) (.2); Review Debtor's Motion re: Local Rule, Proposed Order, and Notice of Hearing (deadline) (.2); Review Supplemental Declaration of Nyemaster re: fees (.1); Review UST objection to McDermott fees (.1); Review Notices setting bar dates for Application for Compensation (2) (.1); Review correspondence from Megan Preusker, Counsel for Bondholders, surrounding redline to Liquidation Trust Agreement and enclosed document with significant amendments to Trust Oversight Committee (.2); Review correspondence from Michael Savetsky addressing Committee considerations on Liquidation Trust Agreement & competing edits of Committee (Liquidation Trust) (.2).	1.20	\$420.00
4/29/2024	RCG	Review correspondence from Emily Keil, Debtor Counsel, on revised plan incorporating comments and enclosed redline only pages.	0.20	\$70.00
4/30/2024	RCG	Review correspondence of Emily Keil, Debtor Counsel, with enclosed redline version of combined plan and disclosure statement, and enclosed document (redline pages only) (.1); Review correspondence of Boris Mankovetskiy on filing version of Liquidation Trust Agreement, and responsive correspondence of Andrew Sherman addressing communication to Constituents, and	1.10	\$385.00

## Statement of Account

MERCY Mercy Hospital, Iowa City, Iowa, et al  
000001 Mercy Hospital, Iowa City, Iowa, et al

03/05/2024 - 05/30/2024  
Time & Rate: Bill Value

## Fees

Date	ID	Description	Time	Bill Amount
		Trust Oversight Committee (.2); Review correspondence from Megan Preusker, Counsel for Preston Hollow, on revised comments to Liquidation Trust Agreement addressing approval of bondholder representatives, and responsive correspondence of Paula Roby, Bondholder Counsel, addressing same (.2); Review correspondence from Andrew Sherman on reservation of rights relative to JV interest (.1); Review correspondence of Boris Mankovetskiy on proposed changes with additional redline language to protect JV interests (.1); Review filed Plan Supplement (Dkt 993) against notes on changes (.2); Review correspondence from Narendra Ganti, FTI Consulting, on FTI Order approving fees, and prepare responsive correspondence on procedure.		
Total Fees: 04/2024			14.00	\$4,900.00
5/2/2024	RCG	Review correspondence from Greg Kopacz on proposed fee application for co-counsel, and review proposed application noting deficiencies relative to requirements under Pothoven (.3); Prepare correspondence to Greg Kopacz addressing Pothoven deficiencies and position surrounding remedy (.1); Prepare Confirmation Hearing witness & exhibit list (.3); Prepare correspondence to Andrew Sherman and Boris Mankovetskiy on proposed witness & exhibit list, and filing (.1); Review correspondence from Andrew Sherman on moving forward and exchanges thereon (.1).	0.90	\$315.00
5/5/2024	RCG	Review correspondence from Andrew Sherman addressing considerations relative to Confirmation Hearing; Review Notice surrounding Ordinary Course Professionals (.1); Review Declaration of Ordinary Course Professionals issued by Controller of Mercy Hospital (.1); Review Court Order granting Progressive Rehabilitation Associates Motion for Payment of Ordinary Course Invoices (.1); Review 5th Monthly Fee Application of HBM Management (26 pages), as Financial Advisor for Official Committee of Pensioners, with notes on same relative to Mark Ross compensation and exhibits supporting application (.2); Review applicable deadline relative to objections on fee application (.1); Review Joint Motion to Vacate Order on PRA Payment for Ordinary Course (.1); Review Debtor's exhibit and witness list for May 16th Hearing (.1); Review witness and exhibit list of MercyOne-Mercy Health Network, Inc. (.1); Prepare correspondence to Andrew Sherman addressing MercyOne witness and exhibit list and filings, given Confirmation Hearing (.1).	1.10	\$385.00
5/6/2024	RCG	Review correspondence from Mark Melickian, Counsel for Concerned Pensioners, on objection to confirmation (.1); Review enclosed objection to confirmation (.2); Review correspondence from Emily Keil, Debtor Counsel, on proposed draft Confirmation Order (.1); Review draft Confirmation Order, exclusive of exhibits (47 pages) (.7); Review correspondence from Greg Kopacz on revised fee application (.1); Review revised fee application, against prior notes relative to same and considerations on Local Rule (.2).	1.40	\$490.00
5/7/2024	RCG	Review Withdrawal of Claim filed by HHS (.1); Review Motion for Relief from Stay filed by Hyundai Capital, attendant exhibits, and statement of corporate ownership (.2); Review MercyOne/Mercy Health Network Objection to Confirmation of Plan, and notes on arguments surrounding due process, and procedure surrounding release; Review Objection to Confirmation of Plan filed by Progressive Rehabilitation Associates (.1); Phone call with Paula Roby, Pensioners Committee, addressing Concerned Pensioners Motion (.1); Review correspondence from Roy Leaf, Debtor Counsel, addressing Local Rule requirements on sign off on Consent Motion and enclosed Consent Motion (.2); Prepare correspondence to Andrew Sherman addressing relief sought and propriety and exchange thereon (.1).	1.20	\$420.00
5/8/2024	RCG	Review correspondence from Boris Mankovetskiy on plan considerations and action items post-plan (.1); Prepare correspondence to Roy Leaf, Debtor Counsel, addressing Local Rule requirements (.1); Review correspondence of Stephanie Hinz addressing same (.1); Review Monthly Fee Application of Nyemaster Goode (.1); Review Notice Setting Bar Date for Objections (.1); Review Application for Compensation of McDermott Will & Emery (.1); Review Notice Setting Bar Date for Objections (.1); Review Hearing Order on Preliminary Motion for Relief from Automatic Stay (.1); Review Appearance and Motion filed on behalf of H2C Securities (.1); Review Court Order Setting Hearing on H2C Securities and Allowance of Compensation (.1); Review correspondence from Michael Savetsky on redline changes to Confirmation Order and enclosed redline (.3); On redline, and objections to plan, review Court Docket for considerations on hearings for May 16, 2024 against case notes (.3); Prepare correspondence to Andrew Sherman addressing May 16, 2024 hearing date, additional case consideration, and Local Rule requirements	2.10	\$735.00



## Statement of Account

MERCY Mercy Hospital, Iowa City, Iowa, et al  
000001 Mercy Hospital, Iowa City, Iowa, et al

03/05/2024 - 05/30/2024  
Time & Rate: Bill Value

## Fees

Date	ID	Description	Time	Bill Amount
		(.2); Review correspondence from Emily Keil, Debtor Counsel, addressing Mercy Confirmation Order redline acceptances and revisions, against proposed changes.		
5/9/2024	RCG	Review correspondence of Michael Savetsky and exchanges with Emily Keil, Debtor Counsel, surrounding revisions to Confirmation Order and exchanges thereon (.2); Review correspondence from Dormie Ko, Bondholders Counsel, on changes to Confirmation Order, and enclosed redline with attention to language on final Cash Collateral Order (.2); Review correspondences of Emily Keil on competing parties request relative to Confirmation Order (.1); Review enclosed changed pages only redline to Confirmation Order and notes on same (14 pages) (.2); Review correspondence of Jacob Park, FTI Consulting, on fee application and requests relative to filing (.1); Review draft fee request, and revise to conform with ordinary course Order & Local Rules (.3); Review Stipulated Order Modifying Automatic Stay (.1); Review Objection to Motion for Payment (Progressive Rehabilitation) filed by Debtor, and citation to applicable Code provisions (.2).	1.40	\$490.00
5/10/2024	RCG	Review correspondence from Emily Keil, Debtor Counsel, addressing proposed reply to confirmation objections, and negotiation surrounding terms (.1); Review report on ballots filed by Debtor, with the enclosed tabulation summary and report of included budgets, and notes on same (.2); Review court correspondence on FTI application, Notice Setting Bar Date (.1); Prepare correspondence to Narendra Ganti & Jacob Park, FTI Consulting, addressing filing & deadlines with enclosed documents (.1).	0.50	\$175.00
5/11/2024	RCG	Review correspondence from Megan Preusker, Counsel for Bondholders, on revisions to released parties language, and enclosed language and responsive correspondence of Emily Keil, Debtor Counsel, addressing same (.1); Prepare correspondence to Andrew Sherman and Boris Mankovetskiy addressing substantive changes to released parties language against outstanding objection in advance of Confirmation Hearing (.2); Review correspondence from Narendra Ganti, FTI Consulting, on fee application.	0.40	\$140.00
5/12/2024	RCG	Review Objection to exhibits filed by MercyOne (.1); Review Court Order granting admission for H2C Securities Counsel (.1); Review Motion for Sale of Property on Debtor's beneficial interest in the Thompson Trust, against proposed Order (Exhibit A) (.3); Review Exhibit B (Beneficiary trusts assignment), Exhibit C (Thompson Trust documents), Exhibit D (Annual Report), Exhibit E (Leaf Declaration), Exhibit F (Board Resolution), Exhibit G (Sale Notice) (.5); Review Notice of Hearing regarding sale (.1).	1.10	\$385.00
5/13/2024	RCG	Participate in strategy call in advance of Confirmation Hearing with Debtor Counsel and Bondholder Counsel; Review correspondence of Emily Keil, Debtor Counsel, addressing revised version of plan and redline statement (.1); Review enclosed redline of plan (.2); Review response to UST's Objection to H2C Securities Fee Application.	0.70	\$245.00
5/14/2024	RCG	Review correspondence from Megan Preusker, on Bondholders proposed revisions to redline changes, and responsive correspondence of Emily Keil, Debtor Counsel, addressing same with changed page redline; Review correspondence from Mark Melickian, Counsel for Concerned Pensioners, on Withdrawal of Limited Objection and enclosed document; Review correspondence from Michael Savetsky addressing revisions to proposed plan; Review correspondence from Emily Keil, Debtor Counsel, on changes, and enclosed redline.	0.40	\$140.00
5/15/2024	RCG	Review modified chapter 11 plan of liquidation against redline notes (.2); Review Notice of Filing of proposed findings of fact and conclusions of law on confirmation of plan, against notes on previously circulated versions (.4); Review Declaration of Mark Toney, on 1129 prove ups (.5); Review Amended Exhibit List filed by Debtor (.1); Review Fee Application for Fifth Third Securities (.1); Review Bar Date on Fee Application, noting deadlines (.1).	1.40	\$490.00
5/16/2024	RCG	Round trip travel time to Cedar Rapids Federal courthouse [billed at 1/2 travel time per Pothoven] (2.2); Pre-hearing communications, and attend Confirmation Hearing on matter (3.8).	6.00	\$2,100.00
5/17/2024	RCG	Review correspondence from Roy Leaf, Debtor Counsel, on revised proposed Order Confirming Plan (.1); Review added paragraph 59 surrounding pension plan reservation of rights (.2).	0.30	\$105.00
5/19/2024	RCG	Review Debtor's First Omnibus Motion for Entry of Order Authorizing Assumption of Executory Contracts, and Exhibits A, B, and C addressing Notice, Proposed Order and Counter-parties (.2); Review Notice Setting Bar Date for Objections (.1); Review Debtors' Amended Witness and Exhibit List addressing evidence received and renumbered exhibits (.1); Review Proceeding Memo and Order on court action relative to Plan and Disclosure Statement, and approval of Orders on	0.60	\$210.00

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Statement of Account

MERCY Mercy Hospital, Iowa City, Iowa, et al  
000001 Mercy Hospital, Iowa City, Iowa, et al

03/05/2024 - 05/30/2024  
Time & Rate: Bill Value

## Fees

Date	ID	Description	Time	Bill Amount
		Compensation (.1); Review Court Order Granting Debtors' Motion Modifying Local Rule on exhibits and production (.1).		
5/20/2024	RCG	Review correspondence of Boris Mankovetskiy addressing Confirmation Hearing, and requirements of Committee.	0.10	\$35.00
5/21/2024	RCG	Review correspondence from Roy Leaf, Debtor Counsel, on personal injury litigation and question surrounding Local Rule requirements (.1); Review proposed Order Granting Motion to Lift Stay (.1); Prepare correspondence to Andrew Sherman and Boris Mankovetskiy on Debtor request and position surrounding Local Rule and opinion thereon (.1); Review correspondence from Boris Mankovetskiy addressing Committee position, and prepare correspondence to Roy Leaf, Debtor Counsel, addressing same; Review correspondence from Bradley Tuttle, EPIQ, on requirements of EPIQ.	0.50	\$175.00
5/22/2024	RCG	Review correspondence from Claire Davison, UST, on Silis Cummis & Gross Fee Application and exchanges thereon with Gregory Kopacz relative to production; Phone call from Tom Slater, Counsel for injury victim, on question surrounding Motion for Relief from Stay and for pursuit, and communication surrounding preclusion given policy considerations (.2); Review correspondence from Roy Leaf, Debtor Counsel, addressing considerations on Mercy Hospital (.1); Review enclosed Proofs of Claim supporting position (cursory review) of contingent on liquidated claims (.2); Review correspondence of Boris Mankovetskiy addressing insurance policy requirement (.1).	0.80	\$280.00
5/23/2024	RCG	Review correspondence from Greg Kopacz on proposed revised support document to address UST fees (.1); Review proposed document, and exhibit (.1); Prepare correspondence to Greg Kopacz on revision to objection deadline given considerations of trustee (.1); Review correspondence from Greg Kopacz on suggested changes (.1); Prepare amendments to notice & support document (.2); Review correspondences (2) from Roy Leaf, Debtor Counsel, addressing various insurance policies given Motions for Relief from Stay (.1); Cursory review of certain policies for consideration on questions presented by Tom Slater relative to relief from stay (.3).	1.00	\$350.00
5/25/2024	RCG	Review correspondence of Roy Leaf, Debtor counsel, on proposed liquidating trust agreement (.1); Review Agreement, against final redline, for conformance with agreed to provisions (.5).	0.60	\$210.00
5/27/2024	RCG	Review Court Order approving compensation for H2C Securities (.1); Review Staffing Report of ToneyKorf Partners, and Exhibit A outlining Function (.1); Review Motion for Relief from Stay filed by Kelly Banks (Exhibit letter & Motion for Relief) & Consent Order granting the relief from the automatic stay (.2); Review Third Application for Compensation of Counsel for Pensioner's Committee (.1); Review Notice of Bar Date relative to objections and applicable deadlines on same (.1).	0.60	\$210.00
5/28/2024	RCG	Review correspondence from Narendra Ganti, FTI Consulting, on question surrounding FTI Fee Application, and enclosed document (.1); Prepare responsive correspondence to Narendra Ganti addressing Interim Compensation Order (Docket #224) and FTI Fee Application (.1); Review correspondence from Roy Leaf, Debtor Counsel, on position surrounding Liquidating Trust Agreement (.1); Review correspondence of Paula Roby, Pensioners Committee, on issues with trust oversight provision (.1); Review correspondence of Boris Mankovetskiy addressing same and requirements of trust and applicable deadlines (.1); Review correspondence from Roy Leaf, Debtor Counsel, surrounding proposed sale of Eastern Iowa Rehabilitation and position surrounding de minimis offer and value (.1); Cursory review of produced documents relative to negotiation and arms length transactions (.2); Phone call with Jeff Taylor, Counsel for Tort Plaintiff, on question surrounding Motion for Relief from Stay, and insurance coverage (.2); Review correspondence from Michael Savetsky on Eastern Iowa Rehabilitation documentation, and exchanges with Roy Leaf, Debtor Counsel, on same.	1.10	\$385.00
5/30/2024	RCG	Review Notices, and Objection to Sale, filed by Thompson Trust (.2); Review Kurka filed Motion and Consent Order against agreed to drafts (.2); Prepare Interim Application for Compensation in conformance with In re Pothoven (.4); Prepare Notice of Bar Date (.2); Review correspondence from Roy Leaf addressing insurance coverage on proposed tort claimant (.1); Review correspondence from Michael Savetsky on consent order and considerations on requested relief (.1); Review correspondence from Jeff Taylor, proposed Motion and Consent Order, against applicable Code provisions (.2); Prepare correspondence to Savetsky on propriety of motion given Debtor representations (.1); Prepare correspondence to Jeff Taylor on Consent Order (.1).	1.60	\$560.00

**Statement of Account**

MERCY Mercy Hospital, Iowa City, Iowa, et al  
 000001 Mercy Hospital, Iowa City, Iowa, et al

03/05/2024 - 05/30/2024  
 Time & Rate: Bill Value

**Fees**

Date	ID	Description	Time	Bill Amount
Total Fees: 05/2024			25.80	\$9,030.00
Total Fees:			96.00	\$33,300.00

**Costs and Expenses**

Date	Description	Orig Expense	Orig Cost	Bill Amount
03/20/2024	Mileage to and From Mediation 3/18/24		\$180.90	\$180.90
03/26/2024	Postage (Objections to Opposing Counsel/ Trustee)	\$16.93		\$16.93
03/29/2024	Photocopies	\$19.20		\$19.20
03/29/2024	Travel to and From hearing in Cedar Rapids		\$180.90	\$180.90
03/31/2024	Miscellaneous Expense- Parking for Hearing		\$3.00	\$3.00
03/31/2024	Miscellaneous Expense- Parking for Settlement Conference		\$2.25	\$2.25
03/31/2024	Filing Fee- Filing Fee Adversary Complaint		\$350.00	\$350.00
Total Costs/Expenses: 03/2024		\$36.13	\$717.05	\$753.18
05/17/2024	Travel to and From Cedar Rapids 5/15/24 for Hearing		\$180.90	\$180.90
Total Costs/Expenses: 05/2024		\$0.00	\$180.90	\$180.90
Total Costs/Expenses:		\$36.13	\$897.95	\$934.08

For Invoice Date: 8/2/2024

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MERCY 000001 MERCY HOSPITAL

Mercy Hospital, Iowa City, Iowa, et al  
000  
ATTN:

**Action**

Bill \_\_\_ Hold \_\_\_ W/U/D \_\_\_ W/O \_\_\_  
Apply Retainer Trust \_\_\_ REDO \_\_\_  
Show to \_\_\_  
Close Matter \_\_\_ AddAttached \_\_\_

Matter Name: Mercy Hospital, Iowa City, Iowa, et al

Responsible: Robert C. Gainer

Originating: Robert C. Gainer

Fee Arrangement: Hourly

Matter Opened on: 8/24/2023

Invoice Style: 01 - Date, ID, Desc, Hours, Amt &amp; Per Recap

☐ Include Invoice in Hard Copy

Fees from - through: 6/1/2024 - 6/23/2024

Other Accounting from - through: 6/1/2024 - 6/23/2024

Type of Law: BR

Quoted Price: \$0.00

Default Rate: F18

Billing Notes:

Matter Description:

**Fees**

Date	ID		Orig Hrs		Orig Amt
Record #		Description	Bill Hrs	Hrly Rate	Bill Amt
6/1/2024 417391	RCG	Review correspondence from Roy Leaf, Debtor Counsel, surrounding sale of the beneficial interest in the Thompson Trust and objection thereto, and exchanges with Paula Roby addressing same (.2); Cursory review of enclosed communications, audited financials, financial statements as provided by UW Health Rehabilitation Hospital and enclosed documents (.9).	1.1 1.1		\$385.00 \$385.00
				<i>Edited</i>	
6/2/2024 417531	RCG	Review Witness and Exhibit List of Debtor relative to Thompson Trust Objection Hearing (.1); Review court correspondence on third application for compensation, and applicable deadlines (.1).	0.2 0.2		\$70.00 \$70.00
6/2/2024 418130	RCG	Review correspondence from Roy Leaf addressing position taken by Thompson Trust, and responsive correspondence of Paula Roby on same (.1); Review Memorandum provided by MW1 counsel regarding position on Estate property and alienation, and review case authority on intersection of 541, 363, and charitable trusts, against IA Code 633A relative to beneficial interest, and notes on same for position of Committee at Hearing (1.1).	1.2 1.2		\$420.00 \$420.00
6/3/2024 417934	RCG	Review correspondence from Andrew Sherman addressing proposed stipulation on staying Adversary (.1); Review Stipulation and proposed Order (.2); Review correspondences from constituents on proposed course of action (.2).	0.5 0.5		\$175.00 \$175.00
6/5/2024 418140	RCG	Review correspondence from Jacob Park, FTI Consulting, on considerations relative to fee application (.1); Review information provided by Jacob Park, and revise fee application in conformance with requirements under Pothoven (.4); Review reply to Trustee Objection filed by Debtor, and notes on intersection of statutory requirements and bank conflation (.4).	0.9 0.9		\$315.00 \$315.00
				<i>Edited</i>	
6/5/2024 418249	RCG	Review correspondence Proceeding Memo on PRA entitlement (.1); Review Notice, and Order, re Withdrawal (.1); Review Epiq fee application, support documents, and Notice re: deadlines (.2); Review Stipulated Motion to Stay (.1).	0.5 0.5		\$175.00 \$175.00
				<i>Edited</i>	
6/6/2024 418141	RCG	Roundtrip travel time for Hearing on Motion to Sell & Objection thereto (4.4) (Bill at one-half time per Pothoven).	2.2 2.2		\$770.00 \$770.00
6/6/2024	RCG	Attend Hearing on Motion to Sell and Objection thereto.	1.5		\$525.00

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MERCY 000001 MERCY HOSPITAL

Matter Name: Mercy Hospital, Iowa City, Iowa, et al

**Fees**

Date	ID		Orig Hrs		Orig Amt
Record #		Description	Bill Hrs	Hrly Rate	Bill Amt
418142			1.5	\$350.00	\$525.00
6/7/2024	RCG	Review correspondence from Boris Mankovetskiy addressing Motion to	0.2		\$70.00
418258		Approve Sale (.1); Prepare correspondence to Andrew Sherman and	0.2	\$350.00	\$70.00
		Boris Mankovetskiy addressing same, and considerations moving			
		forward (.1).			
6/8/2024	RCG	Review Confirmation Ruling (.4); Review authority cited within Ruling,	1.3		\$455.00
418282		relative to impact on applicable deadlines with considerations on	1.3	\$350.00	\$455.00
		potential appeal by MercyOne (.5); Cursory review of Confirmation Order			
		for incorporation of deadlines relative to effective date and requirements			
		of Committee (.4).			
6/8/2024	RCG	Review correspondence of Emily Keil, Debtor Counsel, on Court Order	0.2		\$70.00
418283		on Confirmation and considerations on effective date (.1); Review	0.2	\$350.00	\$70.00
		exchanges as between Nathan Coco, Bondholder Counsel, and Debtor			
		Personnel, relative to confirmation (.1).			
6/9/2024	RCG	Review correspondence from Andrew Sherman addressing Confirmation	0.2		\$70.00
418324		Order & Opinion (.1); Review correspondence of Constituents	0.2	\$350.00	\$70.00
		addressing court Ruling (.1).			
6/12/2024	RCG	Review transfer of claim from MediRevv (.1); Review Court Order	0.2		\$70.00
418566		granting First Omnibus Assumption Motion (.1).	0.2	\$350.00	\$70.00
6/15/2024	RCG	Review Court Order approving second stipulated stay (.1); Against	0.2		\$70.00
418826		deadlines relative to Appeal Confirmation Order, and production,	0.2	\$350.00	\$70.00
		address necessary filings in the event of MercyOne appeal (.1).			
6/18/2024	RCG	Review correspondence from Roy Leaf, Debtor Counsel, addressing	0.2		\$70.00
418913		sale of joint venture interest to life point, responsive corr of Boris	0.2	\$350.00	\$70.00
		Mankovetskiy addressing negotiation and exchanges thereon.			
6/18/2024	RCG	Review Notice of Appeal and Statement of Election to Bankruptcy	0.7		\$245.00
418918		Appellate Panel for the 8th Circuit (.1); Review Motion to Stay Pending	0.7	\$350.00	\$245.00
		Appeal filed by Mercy Health Network (MercyOne) against notes from			
		Confirmation Hearing, relative to recitation of Mark Toney testimony and			
		argument on Purdue Pharma (.4); Review proposed Order (.1); Review			
		correspondence from Andrew Sherman on appeal and exchanges with			
		Debtor Counsel thereon (.1).			
6/18/2024	RCG	Review correspondence from Emily Keil, Debtor Counsel, on Amended	0.3		\$105.00
418995		Liquidation Trust Agreement (.1); Review redline changes to Liquidation	0.3	\$350.00	\$105.00
		Trust Agreement (.1); Review correspondence of Megan Preusker,			
		Counsel for Bondholders, on authorization and responsive			
		correspondence of Paula Roby, Counsel for Pensioners Committee, on			
		same (.1).			
6/18/2024	RCG	Review correspondence of Andrew Sherman, OCUC Counsel,	0.2		\$70.00
418996		addressing appeal of the Confirmation Order, consideration on	0.2	\$350.00	\$70.00
		coordination of efforts (.1); Review correspondence of Constituents			
		addressing proposed course of action (.1).			
6/18/2024	RCG	Participate in phone conference with Debtor counsel and Bondholder	0.8		\$280.00
418997		counsel, addressing strategy considerations, effective date	0.8	\$350.00	\$280.00
		considerations, and outstanding stay pending appeal (.6); Review			
		correspondence of Andrew Sherman, OCUC Counsel, on considerations			

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MERCY 000001 MERCY HOSPITAL

Matter Name: Mercy Hospital, Iowa City, Iowa, et al

**Fees**

Date	ID		Orig Hrs		Orig Amt
Record #		Description	Bill Hrs	Hrly Rate	Bill Amt
		relative to effective date (.1); Review correspondence of Patrick Magallanes, on endorsement of same and correspondence of Andrew Sherman relative to consensus (.1).			
6/19/2024	RCG	Review correspondence from Emily Keil, Debtor Counsel, addressing fully executed Liquidation Trust Agreement and express indication of authorization subject to Agilis Agreement, and responsive correspondences of Megan Preusker, Bondholder Counsel, Andrew Sherman, OCUC Counsel, and Paula Roby, Pensioners Committee.	0.1		\$35.00
419041			0.1	\$350.00	\$35.00
6/19/2024	RCG	Phone call with Andrew Sherman, OCUC Counsel, addressing Motion to Stay, bond amount, and considerations on Effective Date.	0.3		\$105.00
419186			0.3	\$350.00	\$105.00
6/20/2024	RCG	Review correspondence from Emily Keil, Debtor Counsel, surrounding revised release language and Asset Purchase Agreement and redline document (.1); Review correspondence of Boris Mankovetskiy, OCUC Counsel, surrounding redline compare and enclosed document (.1); Review Court Order on MercyOne Motion for Stay of Confirmation Order (.1).	0.3		\$105.00
419164			0.3	\$350.00	\$105.00
6/20/2024	RCG	Review correspondence from Emily Keil, Debtor Counsel, surrounding revised version of Unit Purchase Agreement, and exchanges with Boris Mankovetskiy, OCUC Counsel, addressing same (.2); Review redline versions of Unit Purchase Agreement promulgated by Committee against Debtor proposal, and enclosed revised sale motion, sale notice and proposed Order (.4).	0.6		\$210.00
419257			0.6	\$350.00	\$210.00
6/20/2024	RCG	Review Motion to Continue filed by Thompson Trust.	0.1		\$35.00
419258			0.1	\$350.00	\$35.00
6/21/2024	RCG	Review correspondence of Emily Keil, Debtor Counsel, on current draft of joint opposition to MercyOne stay motion, and exchanges thereafter with Kristina Stanger, Debtor Counsel, and Boris Mankovetskiy, OCUC Counsel (.2); Review revisions to Joint Resistance to Motion for Stay of Confirmation Order (.2).	0.4		\$140.00
419246			0.4	\$350.00	\$140.00
6/21/2024	RCG	Review correspondence from Andrew Sherman, OCUC Counsel, on Joint Response to Motion for Stay Pending Appeal, and responsive correspondence of Constituent addressing same (.1); Review correspondences of Andrew Sherman, addressing considerations for inclusion into final resistance and exchanges with Kristina Stanger, Debtor Counsel, addressing same throughout day (.2).	0.3		\$105.00
419252			0.3	\$350.00	\$105.00
6/21/2024	RCG	Review correspondence from Boris Mankovetskiy, OCUC Counsel, addressing Committee revisions and responsive correspondence of Kristina Stanger, Debtor Counsel, addressing same (.1); Review redline comparison of revisions (.1).	0.2		\$70.00
419254			0.2	\$350.00	\$70.00
6/21/2024	RCG	Review correspondence from Dan Simon, Debtor Counsel, addressing Motion, and responsive correspondences of Andrew Sherman, OCUC Counsel, on same.	0.2		\$70.00
419354			0.2	\$350.00	\$70.00
6/21/2024	RCG	Participate in hearing on Motion for Stay Pending Appeal (.4); Prepare correspondence to Andrew Sherman, OCUC Counsel, addressing hearing presentation and his response on same (.1).	0.5		\$175.00
419364			0.5	\$350.00	\$175.00
6/22/2024	RCG	Review Court Order on Hearing with Thompson Trust (.1); Review	0.6		\$210.00

MERCY 000001 MERCY HOSPITAL

Matter Name: Mercy Hospital, Iowa City, Iowa, et al

### Fees

Date	ID		Orig Hrs		Orig Amt
Record #		Description	Bill Hrs	Hrly Rate	Bill Amt
419391		Objection to Professional Fees (2) filed by the United States Trustee's Office against Debtor Counsel (.2); Review staffing report of ToneyKorf (.1); Review Application for Compensation filed by Fifth Third Securities (.1); Review Notice Setting Bar Date for Objections on applicable deadlines (.1).	0.6	\$350.00	\$210.00
			Orig Hrs	Orig Amt	Bill Hrs
Total Selected Fees			16.2	\$5,670.00	16.2
Total Deferred Fees			0.0	\$0.00	0.0
<b>Total Fees</b>			<b>16.2</b>	<b>\$5,670.00</b>	<b>16.2</b>
				Hrly Rate	Bill Amt
				\$350.00	\$5,670.00
				\$0.00	\$0.00
				<b>\$350.00</b>	<b>\$5,670.00</b>

### Cost & Expenses

Date	ID		Orig Amt
Record #	Code	Description	Bill Amt
6/7/2024	FIRM	Travel to and from Cedar Rapids for Hearing {23488} (270 @ \$0.67)	\$180.90
148287	CATRV		\$180.90
			Orig Amt
Total Selected Cost & Expenses			\$180.90
Total Deferred Cost & Expenses			\$0.00
<b>Total Cost &amp; Expenses</b>			<b>\$180.90</b>
			Bill Amt
			\$180.90
			\$0.00
			<b>\$180.90</b>

### Other Accounting

Date	ID		Orig Amt
Record #		Description	Bill Amt
6/19/2024	FIRM	20% Credit Adjustment Per Filing	\$6,660.00
148404			\$6,660.00
<i>Applied</i>			
6/19/2024	FIRM	Trust Applied as Payment	\$27,574.08
148406			\$27,574.08
<i>Applied</i>			

### Retainer and Trust Activity

Date	ID		Orig Amt
Record #		Description	Bill Amt
6/17/2024	FIRM	Trust Deposit [CK# Wire] [Received From: Mercy Hospital]	\$27,574.08
148405			\$27,574.08
6/19/2024	FIRM	Trust Applied as Payment	\$27,574.08
148406			\$27,574.08
<i>Applied</i>			

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MERCY 000001 MERCY HOSPITAL

Matter Name: Mercy Hospital, Iowa City, Iowa, et al

### History

Current	\$0.00	Last Billing of Matter	6/17/2024	
31-60	\$0.00	Last Payment Received/Transferred	6/19/2024	
61-90	\$0.00	Payment Amount	\$27,574.08	
91-120	\$0.00	Fees Billed/Paid to Date	\$100,295.00	\$80,412.79
121+	\$0.00	Cost & Expenses Billed/Paid to Date	\$1,298.42	\$1,298.42
A/R Balance	\$0.00	Credit & WO Fees/Expenses	\$19,882.21	\$0.00

### Invoice Totals

		Orig Amt	Bill Amt
Balance Forward		\$34,234.08	\$34,234.08
Selected Fees		\$5,670.00	\$5,670.00
Selected Cost & Expenses		\$180.90	\$180.90
Selected Interest		\$0.00	\$0.00
<b>Selected Totals</b>		<b>\$5,850.90</b>	<b>\$5,850.90</b>
Less Payment & Credits		\$34,234.08	\$34,234.08
Invoice Total		<b>\$5,850.90</b>	<b>\$5,850.90</b>
Retainer Balance	\$0.00	Retainer Amount to Apply	
Trust Balance	\$0.00	Trust Amount to Apply	
Total Due After Application			

### Timekeeper Recap

ID	Name	Orig Hours	Original Amount	Billed Hours	Billed Rate	Billed Amount	% of Total	Real-ization	Notes
RCG	Robert C. Gainer	16.20	\$5,670.00	16.20	\$350.00	\$5,670.00	100.0 %	100.0 %	
								<b>100.0 %</b>	



EXHIBIT B  
DECLARATION BY CO-COUNSEL FOR OFFICIAL COMMITTEE

I, Robert C. Gainer, declare as follows:

1. The matters stated in this Declaration are true and correct and within my own personal knowledge and belief. If called as a witness, I could and would competently testify hereto.
2. I am an attorney licensed to practice law before this Court and am the duly employed co-counsel for the Official Committee. I am duly admitted to practice law in the courts of the states of Iowa, Virginia, and in the United States District Courts for the Northern and Southern Districts of Iowa.
3. I have personal knowledge of the facts set forth in the foregoing Fourth and Final Application for Allowance Compensation and, if called upon as a witness, I could and would competently testify as to all of the matters stated therein.
4. All services rendered as associate counsel for the Official Committee for which compensation is sought were actual and necessary for the advancement of the Client's interest.

I declare under penalty of perjury under the laws of the United States, and the laws of the State of Iowa, that the foregoing is true and correct and is executed this 2<sup>nd</sup> day of August, 2024 in Des Moines, Iowa.

/s/ Robert C. Gainer  
Robert C. Gainer